

**IN THE U.S. DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF IOWA
CENTRAL DIVISION**

SUSAN THAYER,
Qui Tam Plaintiff/Relator

ON BEHALF OF HERSELF AND ON
BEHALF OF THE U.S. OF AMERICA,

Plaintiffs,

vs.

PLANNED PARENTHOOD OF THE
HEARTLAND, INC. (f/k/a PLANNED
PARENTHOOD OF GREATER IOWA,
INC.),

Defendant.

Case No. 4:11-cv-00129-JAJ-CFB

**DECLARATION OF JAE K. PARK IN
SUPPORT OF MOTION FOR
REASONABLE ATTORNEY FEES**

Judge John A. Jarvey

I, Jae K. Park, declare, pursuant to 28 U.S.C. §1746, that the following is true and correct:

1. I am an attorney at the law firm of Dentons US LLP (“Dentons”) and am one of the attorneys for the defendant, Planned Parenthood of the Heartland, Inc. (“PPH”).

2. I submit this declaration in support of PPH’s Motion for Reasonable Attorney Fees. I make this declaration based on my personal knowledge, information, and belief.

3. Since August, 2012, Dentons has served as lead counsel on this matter on a *pro bono* basis. Dentons attorneys are required to record their time spent on all matters, including *pro bono* matters. Attached hereto as Exhibit 1 is a chart listing all of the time spent by Dentons lawyers, law clerks, summer associates, paralegals, research specialists and other professionals on this matter, generated from a software called Elite Enterprise 3.10 from the time entries recorded by the professionals over the course of the case. The time narratives have been edited

for clarity and to remove attorney-client privileged communications. The hours billed were not modified.

4. In total, 54 Dentons professionals collectively recorded 6,856.8 hours of time spent representing PPH in this case. There are over 3,200 separate time entries made by these 54 professionals. The total value of legal services provided, at these professionals' historical hourly rates, is \$3,551,569.

5. Of the 54 professionals who worked on this case, seven of us—Mr. Gilbert, Ms. Amlot, Mr. Lu, Ms. Rodriguez, Ms. Sangiacomo, Mr. White, and myself—made the most time-intensive contributions to PPH's defense, by helping develop the overall strategy, drafting and arguing motions, researching and drafting resistances to Thayer's motions, conducting depositions, and analyzing the evidence. In addition, ten others—Ms. Dosen, Mr. Faits, Mr. Hayes, Ms. Amatore, Ms. Lipscomb, Ms. Trachtenberg, Ms. Hasan, Ms. Petrek, Ms. Peatman, and Ms. Smith—provided invaluable support by drafting motions, conducting legal research, performing investigations, reviewing and analyzing evidence, supporting discovery efforts, and other related tasks.

6. For time spent by Dentons lawyers, PPH is moving to recover attorney fees based on the value of the time spent by these seven "key" contributors identified above, and for time spent on the four of the six relevant categories under Local Rule 54A(a): pleadings, motions and briefs; legal research; investigation of facts; and interviewing witnesses. Trial and Trial Preparation was not considered as PPH prevailed in the case by filing successful motions for summary judgment. A separate declaration will support time spent by Davis Brown.

7. Each one of the 3,200+ time entries made by Dentons' professionals have been reviewed to identify and tabulate the time spent by the seven "key" contributors on the four of the six relevant categories under Local Rule 54A(a).

8. The results of that review and analysis is summarized in the chart below:

Professional	Total Hours Worked	Worked Value
A Gilbert	251 hours	\$243,827.50
C White	660.05 hours	\$342,172.25
J Park	583.20 hours	\$345,592.00
K Rodriguez	1,239.75 hours	\$847,199.75
R Sangiacomo	495.20 hours	\$207,984.00
T Amlot	680.10 hours	\$417,639.00
T Lu	601.30 hours	\$238,361.00
TOTAL	4,303.20 hours	\$2,643,775.50

9. Time spent on four of the six relevant categories under Local Rule 54A(a), and the time requested in PPH's motion, is summarized as follows:

a. Pleadings, Motions, and Briefs:

Professional	Hours Worked	Hours Requested
A Gilbert	98.3 hours	88.47 hours
C White	292.80 hours	263.52 hours
J Park	290.30 hours	261.27 hours
K Rodriguez	527.00 hours	474.30 hours
R Sangiacomo	141.50 hours	127.35 hours

Professional	Hours Worked	Hours Requested
T Amlot	289.00 hours	260.10 hours
T Lu	217.00 hours	195.30 hours
TOTAL	1,855.90 hours	1,670.31 hours

b. Legal Research

Professional	Hours Worked	Hours Requested
A Gilbert	5.00 hours	4.50 hours
C White	115.10 hours	103.59 hours
J Park	52.70 hours	47.43 hours
K Rodriguez	45.65 hours	41.09 hours
R Sangiacomo	18.60 hours	16.74 hours
T Amlot	45.00 hours	40.50 hours
T Lu	32.40 hours	29.16 hours
TOTAL	314.45 hours	283.01 hours

c. Investigation

Professional	Hours Worked	Hours Requested
A Gilbert	46.60 hours	41.94 hours
C White	177.20 hours	159.48 hours
J Park	196.60 hours	176.94 hours
K Rodriguez	478.00 hours	430.20 hours
R Sangiacomo	326.30 hours	293.67 hours
T Amlot	163.60 hours	147.24 hours

Professional	Hours Worked	Hours Requested
T Lu	339.40 hours	305.46 hours
TOTAL	1,727.70 hours	1,554.93 hours

d. Interviewing

Professional	Hours Worked	Hours Requested
A Gilbert	2.80 hours	2.52 hours
C White	0.70 hours	0.63 hours
J Park	9.20 hours	8.28 hours
K Rodriguez	10.60 hours	9.54 hours
R Sangiacomo	0.00 hours	0.00 hours
T Amlot	21.80 hours	19.62 hours
T Lu	0.00 hours	0.00 hours
TOTAL	45.10 hours	40.59 hours

While allocating the time spent into the various categories, it became apparent that there is some overlap between the categories, and certain tasks fell into more than one category. In such instances, the time was allocated to only one category that best fit the task, and was not double-counted. For example, time spent performing legal research for a motion was put into Pleadings, Motions, and Briefs rather than Legal Research. Also, time spent interviewing witnesses was often allocated to Investigations rather than Interviewing, because the interviews were conducted as part of an investigation. This accounts for the higher number of hours allocated to Pleadings, Motions, and Briefs compared to Legal Research, and the higher number of hours allocated to Investigations compared to Interviewing.

10. As indicated Exhibit 1, Dentons' attorneys spent time performing tasks beyond the four categories outlined in Local Rule 54A(a), such as considering strategy, organizing, attending to the US Department of Justice's Motion to Amend the Protective Order (Dkt 228), and responding to Thayer's appeal (Dkt. 49) of the Court granting PPH's motion to dismiss Thayer's Second Amended Complaint (Dkt. 39, 40). Time spent by any lawyer on such tasks was not included in the above tabulations. In addition, the time billed by these attorneys was discounted by 10% to account for inefficiencies that may have been caused by turnover of attorneys, duplication, learning the case, and other similar factors.

11. Reducing the above hours by 10%, and then multiplying it by the historic hourly rates of these seven attorneys, results in \$2,050,796.03. Given that Dentons professionals collectively worked 6,856.8 hours, the effective hourly rate for Dentons' legal services is less than \$300/hour.

12. I have personal knowledge of certain of the litigation efforts undertaken in this matter and I am aware of historical litigation efforts in this case through my involvement in this matter. The time spent by the above professionals was reasonable in light of the contentious nature of the case. The case was challenging because Thayer changed her claims and allegations multiple times. With each change, PPH had to change its strategy, research, and analysis to address the new claims and allegations. PPH also filed multiple, successful motions, including two motions to dismiss, and two motions for summary judgment. Further, Relator's motions for summary judgment included hundreds of facts that she claimed were undisputed and that required PPH to provide lengthy and detailed responses with citations to the record. The above lawyers made significant contributions to these motions.

13. My current hourly rate on this matter is \$670/hour. The hourly rates of all of the professionals have increased over the nearly eight years of this case. Attached hereto as Exhibit 2 is a chart summarizing the changes in the hourly rates for the seven relevant lawyers.

14. The hourly rates of Dentons professionals are set by Dentons' management, which is reviewed and set at the beginning of each year. Dentons sets the hourly rates for its professionals to be competitive, after considering many factors and sources of attorney hourly rates, including but not limited to Thomson Reuters' (fka West's) Peer Monitor law firm benchmarking database, which is available at: <https://peermonitor.thomsonreuters.com/>.

15. The hourly rates for the seven relevant professionals are commensurate with their level of experience, expertise, and position and the nature of the matter.

16. Mr. Alan Gilbert's qualifications are summarized in his declaration. The qualifications of the remaining members of the defense team is summarized below.

17. I am a member of Dentons' Litigation and Dispute Resolution practice group. I focus on complex commercial litigation and complex construction and engineering disputes arising out of civil and infrastructure construction projects. I am experienced in litigating False Claims Act cases (*e.g.*, *Shimmick Construction Company et al. v. San Diego County Water Authority*, Riverside County Superior Court Case No. RIC1609196; *San Diego County Water Authority v. MWH Americas, Inc. et al.*, San Diego County Superior Court Case No. 37-2011-00090504-CU-BC-CTL) and have given presentations on the False Claims Act. I graduated from the University of San Diego School of Law in 2004 and became a partner at Dentons in 2020. My qualifications are summarized on my profile on Dentons' website, which is attached hereto as Exhibit 3.

18. Ms. Kristen Rodriguez graduated from University of Michigan Law School in 2009. She became a partner at Dentons in 2017. She has a national practice based out of Chicago, IL and Washington, D.C., representing clients in high-stakes complex business litigation, such as class action defense, first amendment/defamation claims, media and entertainment claims, and insurance litigation. She has been admitted to practice in the courts of the state of Illinois; District of Columbia; the US Courts of Appeal for the Second, Seventh, Eighth, and Eleventh Circuits; and in the US District Courts for the Central District of Illinois, Northern District of Illinois, and the Eastern District of Michigan. She has been admitted pro hac vice to a number of other courts and jurisdictions. Ms. Rodriguez's qualifications are summarized on my profile on Dentons' website, which is attached hereto as Exhibit 4.

19. Ms. Tiffany Amlot is a former colleague who is now General Counsel of John Crane. While at Dentons, she was a member of the Litigation and Dispute Resolution practice group and also focused on complex commercial litigation. She graduated from University of Michigan School of Law in 2004 and became a partner of Dentons in 2015. Ms. Amlot's profile that was published on Dentons' website when she was still with the firm is attached hereto as Exhibit 5.

20. Ms. Rosanne Sangiacomo is a former colleague who most recently was Corporate Counsel at WellCare Health Plans. While at Dentons, she was also a member of the Litigation and Dispute Resolution practice group and also focused on complex commercial litigation. She graduated from University of Virginia School of Law in 2013. Her last title at Dentons was Managing Associate. Ms. Sangiacomo's profile that was published on Dentons's website when she was still with the firm is attached hereto as Exhibit 6.

21. Mr. Tony Lu is a member of Dentons' Litigation and Dispute Resolution practice group. He focuses on complex commercial litigation, including trade secret litigation, unfair competition, and cross-border disputes, and represents clients in many jurisdictions. He graduated from University of Connecticut School of Law in 2010. Mr. Lu's current title at Dentons is Managing Associate. Mr. Lu's Dentons' profile is attached hereto as Exhibit 7.

22. Mr. T. Carter White is also a member of Dentons' Litigation and Dispute Resolution practice group. He also focuses on complex commercial litigation, as well as class action defense and bankruptcy litigation. He graduated from Northwestern University School of Law in 2013. Mr. White's current title at Dentons is Senior Managing Associate. His Dentons profile is attached hereto as Exhibit 8.

23. Each of the above team members made contributions to the case that directly led to the successful result in the case.

I, Jae Park, declare under penalty of perjury that the foregoing is true and correct to the best of knowledge.

Executed on: June 19, 2020

SIGNATURE: _____



Exhibit 1

Time Entry Records in
United States ex rel. Thayer v. Planned Parenthood of the Heartland

Date	Name / Invoice Number	Hours	Plds, Mtn, Brief	Research	Investigation	Interviewing	Amount	Description
8/1/2012	Alan S. Gilbert	0.50				0.50	\$ 397.50	Conference B. Weinberg (0.2); telephone conference Kyle Carlson at client (0.3).
8/8/2012	Alan S. Gilbert	0.50			0.50		\$ 397.50	Telephone conference Kyle Carlson re: qui tam case.
8/9/2012	Alan S. Gilbert	1.00	1.00				\$ 795.00	Conference T. Amlot re: case (0.9); transmit documents to T. Amlot re: case (0.1).
8/10/2012	Alan S. Gilbert	0.30	0.30				\$ 238.50	Conference T. Amlot re: case.
8/10/2012	Tiffany L. Amlot	0.60	0.60				\$ 309.00	Discuss matter with A. Gilbert and initial brief review of pleadings.
8/12/2012	Alan S. Gilbert	0.70	0.70				\$ 556.50	Review First Amended Complaint.
8/13/2012	Alan S. Gilbert	2.00	1.00		0.50	0.50	\$ 1,590.00	Review Second Amended Complaint (1.0); telephone conference clients and Des Moines counsel (0.5); conferences SNR Denton lawyers (0.5).
8/13/2012	Ramji Kaul	0.50	0.50				\$ 257.50	Follow-up with T. Amlot regarding qui tam suits.
8/13/2012	Tiffany L. Amlot	7.30	1.40	4.70		1.20	\$ 3,759.50	Review and analyze complaints and associated pleadings (1.4); conference call with client and local counsel, including follow up with A. Gilbert (1.2); begin research and analysis of claims asserted and potential defenses, including consultation with R. Kaul, A. Gilbert and K. Rodriguez; review of actions against PP of LA; review of decision by Judge Garvey and general qui tam analysis (4.7).
8/14/2012	Alan S. Gilbert	0.60				0.50	\$ 477.00	Telephone conference R. Evans of PPFA (0.5); conference T. Amlot (0.1).
8/14/2012	Tiffany L. Amlot	3.70	0.30	2.90		0.50	\$ 1,905.50	Call with A. Gilbert and PPFA (.5); analyze memo re: changes to second amended complaint (.3); collect and preserve info. and public comments of plaintiff and attorneys (1.4); continue researching and reviewing qui tam issues (1.5).
8/14/2012	Kristen C. Rodriguez	0.20	0.20				\$ 67.00	Review second amended complaint.
8/15/2012	Tiffany L. Amlot	0.60		0.60			\$ 309.00	Research issues re: response deadline and documents re: same, including communications with Iowa counsel and review of docket. (.6).
8/15/2012	Alan S. Gilbert	0.20					\$ 159.00	Emails re: waiver of service of process.
8/16/2012	Tiffany L. Amlot	0.30					\$ 154.50	Review and respond to documents and emails re: waiver of service.
8/17/2012	Tiffany L. Amlot	0.60					\$ 309.00	Review and analyze additional documents and rules regarding waiver of service and deadline to answer or otherwise plead, including communications regarding same.
8/21/2012	Tiffany L. Amlot	1.30	1.30				\$ 669.50	Conference with K. Rodriguez to discuss potential motion to dismiss and analysis needed for same.
8/21/2012	Ramji Kaul	0.20					\$ 103.00	Confer with T. Amlot regarding Qui Tam issues.
8/21/2012	Kristen C. Rodriguez	2.00	1.90				\$ 670.00	Review and analyze complaint (.6); Confer with T. Amlot regarding strategy for response to complaint (1.3).
8/22/2012	Kristen C. Rodriguez	2.75		2.75			\$ 921.25	Research regulations referenced in complaint and outline each claim in preparation for drafting motion to dismiss.
8/23/2012	Kristen C. Rodriguez	1.00		1.00			\$ 335.00	Continued research regarding regulations referenced in complaint.
8/23/2012	Tiffany L. Amlot	1.00		1.00			\$ 515.00	Review materials regarding pertinent regulations and conference with K. Rodriguez re: same (.6); telephone conference with A. Gilbert re: status and strategy (.4).
8/23/2012	Alan S. Gilbert	0.10					\$ 79.50	Conference T. Amlot re: strategy.
8/29/2012	Tiffany L. Amlot	2.80	2.80				\$ 1,442.00	Research and draft motion to unseal the record.
8/30/2012	Alan S. Gilbert	1.00	0.50			0.50	\$ 795.00	Telephone conference client (0.2) and conferences SNR Denton lawyers re: cmail (0.3) review draft motion to unseal pleadings (0.3) conference T. Amlot re: same (0.2).
8/30/2012	Tiffany L. Amlot	0.50	0.50				\$ 257.50	Review communications regarding audit issues and consult with Alan Gilbert re same and potential motion to unseal.
8/31/2012	Tiffany L. Amlot	0.30					\$ 154.50	Teleconference with A. Gilbert re: status and strategy.
9/5/2012	Tiffany L. Amlot	0.70	0.40				\$ 360.50	Telephone conference with J. Wilson re: motion to seal (.2); communications with A. Gilbert re: same (.2); update strategy and summary for team and client (.3).
9/5/2012	Alan S. Gilbert	2.50	1.40		0.50		\$ 1,987.50	Review memo from client (0.5); review Second Amended Complaint (0.8); review decision and motion in Texas case (0.7); email client re: status (0.5).
9/6/2012	Tiffany L. Amlot	0.30	0.30				\$ 154.50	Review and revise pro hac vice motions.
9/9/2012	Kristen C. Rodriguez	0.40		0.40			\$ 134.00	Research regarding pertinent regulations governing allegations in complaint.
9/10/2012	Alan S. Gilbert	0.10			0.10		\$ 79.50	Review posting by plaintiff's counsel.

Time Entry Records in
United States ex rel. Thayer v. Planned Parenthood of the Heartland

Date	Name / Invoice Number	Hours	Plds, Mtn, Brief	Research	Investigation	Interviewing	Amount	Description
9/10/2012	Tiffany L. Amlot	0.50			0.50		\$ 257.50	Review various media coverage of suit and related claims.
9/11/2012	Tiffany L. Amlot	2.80	2.80				\$ 1,442.00	Analyze claims and formulation of responses to same.
9/12/2012	Tiffany L. Amlot	3.40	2.40				\$ 1,751.00	Conference with A. Gilbert re: strategy (1.0); continue evaluating claims and defenses (2.4).
9/12/2012	Alan S. Gilbert	1.00					\$ 795.00	Conference T. Amlot re: response to complaint and unsealing of documents.
9/18/2012	Alan S. Gilbert	0.40			0.20		\$ 318.00	Email re: auditor inquiry re: returned contraceptives (0.2); conference T. Amlot and telephone conference K. Carlson (0.2).
9/18/2012	Kristen C. Rodriguez	0.20			0.20		\$ 67.00	Attention to correspondence regarding c-mail audit.
9/18/2012	Tiffany L. Amlot	6.20		3.20	3.00		\$ 3,193.00	Research issues to outline motion to dismiss (3.2); analyze information provided by client (3).
9/19/2012	Alan S. Gilbert	2.40					\$ 1,908.00	Conference T. Amlot re: responding to complaint (1.4); drafting engagement letter (0.5); telephone conference clients (.5).
9/19/2012	Tiffany L. Amlot	7.40	0.50	3.80			\$ 3,811.00	Conference with A. Gilbert re: status and strategy (1.4); conference with clients (1.3); telephone conference with local counsel re: extension, status, etc. (.4); complete pro hac forms and arrange for filing (.5); legal research re: motion to dismiss and work on outline of same (3.8).
9/20/2012	Tiffany L. Amlot	5.80	0.50	2.80	2.50		\$ 2,987.00	Review and finalize pro hac materials (0.5); analyze documents in plaintiff's personnel file (2.5); continue legal research (2.8).
9/24/2012	Alan S. Gilbert	0.20					\$ 159.00	Conference T. Amlot re: response to complaint.
9/24/2012	Kristen C. Rodriguez	1.00	1.00				\$ 335.00	Prepare for meeting with T. Amlot regarding status to date on motion to dismiss and research needed (1.0); Conference with T. Amlot regarding same.
9/24/2012	Tiffany L. Amlot	4.30		2.90	0.40		\$ 2,214.50	Analyze memo and communications from client re: scopes of practice and Rh tests (.4); review and research issues for motion to dismiss to identify areas of additional research and structure of motion (2.9); conference with K. Rodriguez re: same (1.0).
9/25/2012	Kristen C. Rodriguez	0.80	0.80				\$ 268.00	Draft and revise motion for extension of time to answer second amended complaint.
9/25/2012	Tiffany L. Amlot	0.60					\$ 309.00	Review correspondence from opposing counsel re: extension of time and follow-up communications re: same.
9/26/2012	Tiffany L. Amlot	2.40	2.40				\$ 1,236.00	Review and revise motion for extension of time; communications re: same; arrange for filing of same.
9/26/2012	Kristen C. Rodriguez	0.20	0.20				\$ 67.00	Review and revise motion for extension of time.
9/27/2012	Tiffany L. Amlot	0.20	0.20				\$ 103.00	Revise pro hac related forms and arrange for communication with Clerk re: same.
9/27/2012	Alan S. Gilbert	0.10	0.10				\$ 79.50	Review motion for extension of time and emails re: same.
10/1/2012	Alan S. Gilbert	0.30	0.10				\$ 238.50	Review plaintiff's opposition to motion to extend time and emails re: same.
10/1/2012	Tiffany L. Amlot	0.50	0.50				\$ 257.50	Review response brief from plaintiff re: motion for extension and communications re: same.
10/1/2012	Kristen C. Rodriguez	3.10		3.10			\$ 1,038.50	Research in support of motion to dismiss complaint, including regarding 9b applicability.
10/2/2012	Kristen C. Rodriguez	3.90		3.90			\$ 1,306.50	Research in support of motion to dismiss complaint, including regarding 9b applicability, impact of USA electing not to intervene, and standard of care as basis for qui tam action.
10/3/2012	Kristen C. Rodriguez	0.10		0.10			\$ 33.50	Correspondence with T. Amlot regarding research to date.
10/3/2012	Tiffany L. Amlot	0.50		0.50			\$ 257.50	Review and respond to research analysis from K. Rodriguez.
10/10/2012	Alan S. Gilbert	0.30			0.30		\$ 238.50	Review right to life publication with article by Thayer.
10/10/2012	Tiffany L. Amlot	0.60			0.30		\$ 309.00	Analyze Thayer communications to the media.
10/11/2012	Kristen C. Rodriguez	0.20	0.20				\$ 67.00	Confer with T. Amlot regarding motion to dismiss.
10/17/2012	Alan S. Gilbert	0.20			0.20		\$ 159.00	Review letter from Justice Department.
10/17/2012	Tiffany L. Amlot	2.40		2.40			\$ 1,236.00	Research issues re: dismissal for failing to follow sealing requirements and analyze same.
10/17/2012	Kristen C. Rodriguez	0.30			0.30		\$ 100.50	Review letter from Government and confer with T. Amlot regarding: same.
10/18/2012	Tiffany L. Amlot	7.40	6.40				\$ 3,811.00	Conferences and follow-up re: government letter (1.0); draft motion to dismiss, including conference with A. Gilbert and legal research in support of same (6.4).
10/18/2012	Kristen C. Rodriguez	4.00	4.00				\$ 1,340.00	Draft section of motion to dismiss regarding insufficient 9b allegations.

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Date	Name / Invoice Number	Hours	Plds, Mtn, Brief	Research	Investigation	Interviewing	Amount	Description
10/18/2012	Alan S. Gilbert	0.70	0.70				\$ 556.50	Conference T. Amlot re: motion to dismiss.
10/19/2012	Tiffany L. Amlot	8.70	8.70				\$ 4,480.50	Draft motion to dismiss, including legal and factual research in support of same.
10/19/2012	Kristen C. Rodriguez	4.20	4.20				\$ 1,407.00	Research in support of rule 9(b) allegations (2.0); draft factual allegations background section for brief (1.2); draft rule 9(b) section for brief (1.0).
10/20/2012	Kristen C. Rodriguez	2.30	1.70	0.60			\$ 770.50	Draft 9b section of motion to dismiss (1.5); Research regarding federal case law applicable to Iowa regulations in support of motion to dismiss (.6); Correspondence with T. Amlot regarding edits to brief (.2).
10/20/2012	Tiffany L. Amlot	10.60	10.60				\$ 5,459.00	Draft motion to dismiss, including legal and factual research in support of same.
10/21/2012	Tiffany L. Amlot	4.20	4.20				\$ 2,163.00	Draft motion to dismiss, including legal and factual research in support of same.
10/21/2012	Kristen C. Rodriguez	0.50	0.50				\$ 167.50	Review draft brief in support of motion to dismiss.
10/22/2012	Tiffany L. Amlot	2.40	1.00		1.40		\$ 1,236.00	Telephone conference with Iowa counsel re: government communication (1.4); conferences re: draft motion to dismiss brief (1.0).
10/22/2012	Alan S. Gilbert	0.20			0.20		\$ 159.00	Review document preservation letter from relator and emails re: same.
10/22/2012	Kristen C. Rodriguez	1.10	1.10				\$ 368.50	Review and edit motion to dismiss (0.6); conference with T. Amlot regarding same (0.5).
10/23/2012	Alan S. Gilbert	1.50	1.50				\$ 1,192.50	Review draft motion to dismiss and conferences T. Amlot re: same.
10/23/2012	Tiffany L. Amlot	6.30	6.30				\$ 3,244.50	Continue revising draft brief, including additional legal and factual research, consults with A. Gilbert and numerous communications with clients.
10/23/2012	Kristen C. Rodriguez	4.10	4.10				\$ 1,373.50	Research and edit brief in support of motion to dismiss second amended complaint.
10/24/2012	Tiffany L. Amlot	5.10	3.90				\$ 2,626.50	Call with clients (1.2); continue revisions to brief, including communications with local counsel and clients and further factual research (3.9).
10/24/2012	Kristen C. Rodriguez	1.00	0.50				\$ 335.00	Attend call regarding document preservation plan (0.5); Review memorandum of law in support of motion to dismiss.
10/25/2012	Kristen C. Rodriguez	3.00	3.00				\$ 1,005.00	Draft and revise motion to accompany brief for motion to dismiss (2.5); confer with T. Amlot regarding revisions to same (0.5).
10/25/2012	Tiffany L. Amlot	4.30	4.30				\$ 2,214.50	Continue work on brief and factual developments, including further communications with clients.
10/26/2012	Tiffany L. Amlot	0.80	0.80				\$ 412.00	Continue review and revise motion and brief.
10/26/2012	Kristen C. Rodriguez	1.30	1.30				\$ 435.50	Revise motion to dismiss and memorandum of law in support.
10/26/2012	Alan S. Gilbert	0.30	0.30				\$ 238.50	Conferences SNR Denton lawyers re: motion to dismiss.
10/28/2012	Kristen C. Rodriguez	1.40	1.40				\$ 469.00	Edit brief in support of motion to dismiss.
10/29/2012	Kristen C. Rodriguez	2.10	2.10				\$ 703.50	Edit brief in support of motion to dismiss (1.5); Correspondence with T. Amlot regarding same and response timeline (.2); Review local rules regarding filing and deadlines for response (.4).
10/29/2012	Tiffany L. Amlot	2.90	2.90				\$ 1,493.50	Finalize motion, brief and attachments and file same.
10/29/2012	Alan S. Gilbert	0.30	0.30				\$ 238.50	Review changes in memorandum in support of motion to dismiss (0.2); conferences SNR Denton lawyers (0.1).
11/5/2012	Tiffany L. Amlot	0.40			0.40		\$ 206.00	Work on response to preservation demand letter.
11/6/2012	Tiffany L. Amlot	1.10			1.10		\$ 566.50	Address issues re: preservation demand and anticipated reply schedule.
11/6/2012	Kristen C. Rodriguez	1.30			1.30		\$ 435.50	Review plaintiffs' discovery preservation letter; Draft letter in response to same.
11/7/2012	Tiffany L. Amlot	2.70			2.70		\$ 1,390.50	Review and revise draft response to plaintiff's preservation letter and communications re: same.
11/7/2012	Alan S. Gilbert	0.50			0.50		\$ 397.50	Review draft response to document preservation letter and conferences with T. Amlot re: same.
11/15/2012	Tiffany L. Amlot	1.60	1.60				\$ 824.00	Review and analyze response brief and communications re: same.
11/15/2012	Alan S. Gilbert	0.50	0.50				\$ 397.50	Review response to Motion to Dismiss and conference with T. Amlot re: same.
11/15/2012	Kristen C. Rodriguez	0.40	0.40				\$ 134.00	Review plaintiff's response to motion to dismiss; attention to correspondence regarding same.
11/16/2012	Alan S. Gilbert	1.00	1.00				\$ 795.00	Conference with SNR lawyers re: reply in support of Motion to Dismiss.
11/16/2012	Tiffany L. Amlot	2.60	2.60				\$ 1,339.00	Analyze/outline issues for reply (1.6); meetings and communications re: same (0.5); conference with opposing counsel (0.5).

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Date	Name / Invoice Number	Hours	Plds, Mtn, Brief	Research	Investigation	Interviewing	Amount	Description
11/16/2012	Kristen C. Rodriguez	2.20	2.20				\$ 737.00	Review and analyze plaintiff's response to motion to dismiss (1.7); conference with A. Gilbert and T. Amlot regarding same (0.5).
11/19/2012	Tiffany L. Amlot	1.60	0.60		1.00		\$ 824.00	Conference with client (0.3); review additional materials from FPCI (1.0); draft and file motion for extension of time (0.3).
11/19/2012	Kristen C. Rodriguez	0.10	0.10				\$ 33.50	Attention to order regarding extension on motion to dismiss reply.
11/25/2012	Tiffany L. Amlot	6.50	6.50				\$ 3,347.50	Research and draft reply brief in support of motion to dismiss.
11/26/2012	Tiffany L. Amlot	2.90	2.90				\$ 1,493.50	Review and revise reply brief (2.4); telephone conference with opposing counsel (0.2); review pleadings (0.5).
11/26/2012	Alan S. Gilbert	0.80	0.50				\$ 636.00	Emails re: scheduling issues (0.3); review and edit reply in support of Motion to Dismiss (0.5).
11/26/2012	Kristen C. Rodriguez	0.50	0.30		0.20		\$ 167.50	Review reply in support of motion to dismiss (0.3); attention to correspondence regarding strategy for timing of discovery plan submission (0.2).
11/27/2012	Tiffany L. Amlot	1.90	1.90				\$ 978.50	Consult with A. Gilbert (0.5); revise reply brief and distribute same (1.4).
11/27/2012	Alan S. Gilbert	1.30	1.30				\$ 1,033.50	Revising reply in support of motion to dismiss and conference with T. Amlot re: same.
11/28/2012	Kristen C. Rodriguez	0.50	0.50				\$ 167.50	Review and analyze draft of reply brief in support of motion to dismiss.
11/29/2012	Tiffany L. Amlot	0.50	0.50				\$ 257.50	Review and respond to communications from client (0.2); finalize reply brief (0.3).
11/30/2012	Tiffany L. Amlot	0.30	0.30				\$ 154.50	Finalize and file reply brief.
11/30/2012	Kristen C. Rodriguez	0.50	0.50				\$ 167.50	Review and edit reply brief for filing.
12/12/2012	Kristen C. Rodriguez	0.30	0.30				\$ 100.50	Review docket sheet and status of joint motion.
12/13/2012	Tiffany L. Amlot	1.30					\$ 669.50	Review and respond to correspondence from A. Dey re: upcoming legislative hearing on litigation, including consult with A. Gilbert re: same.
12/13/2012	Alan S. Gilbert	0.30					\$ 238.50	Conference with T. Amlot re: statement for Arkansas legislative committee.
12/28/2012	Tiffany L. Amlot	1.20					\$ 618.00	Review decision and communications re: same; review and respond to numerous communications re: draft press release, etc.
12/28/2012	Kristen C. Rodriguez	0.50					\$ 167.50	Review and analyze court's decision, and attention to correspondence regarding same.
12/28/2012	Alan S. Gilbert	0.50					\$ 397.50	Review order dismissing complaint and emails re: same; review and comment on press release.
1/7/2013	Alan S. Gilbert	0.40	0.40				\$ 332.00	Review posting of plaintiff's counsel re: motion for reconsideration and conference T. Amlot re: same.
1/15/2013	Alan S. Gilbert	0.50	0.20	0.30			\$ 415.00	Review new Fourth Circuit FCA case and send to SNR Denton lawyers (0.3); conference T. Amlot re: possible costs petition (0.2).
1/15/2013	Tiffany L. Amlot	0.60		0.60			\$ 324.00	Review recent false claims case and communications re: same (.3); review statutes re: bill of costs and communications re: same (.3).
1/24/2013	Kristen C. Rodriguez	0.20			0.20		\$ 93.00	Review docket and motion for pro hac vice.
1/24/2013	Tiffany L. Amlot	0.40			0.40		\$ 216.00	Review numerous filings by plaintiffs and communications re: same.
1/25/2013	Tiffany L. Amlot	2.70	2.70				\$ 1,458.00	Review and analyze plaintiff's motion for reconsideration and communications re: same.
1/25/2013	Alan S. Gilbert	0.50	0.50				\$ 415.00	Emails re: motion to alter or amend judgment.
1/25/2013	Kristen C. Rodriguez	0.40	0.40				\$ 186.00	Review and analyze motion for reconsideration.
1/28/2013	Alan S. Gilbert	1.00	1.00				\$ 830.00	Review motion to alter or amend judgment and supporting documents and email SNR Denton lawyers re: same.
1/28/2013	Tiffany L. Amlot	0.60	0.60				\$ 324.00	Communications with client and team re: motion for reconsideration.
1/28/2013	Kristen C. Rodriguez	0.50	0.50				\$ 232.50	Review and analyze motion to reconsider.
1/29/2013	Tiffany L. Amlot	0.40			0.40		\$ 216.00	Review and respond to numerous communications re: HIPAA and factual investigation.
1/29/2013	Alan S. Gilbert	0.20	0.20				\$ 166.00	Email R. Evans.
1/30/2013	Alan S. Gilbert	0.30			0.30		\$ 249.00	Emails re: HIPAA and other issues regarding names provided by Thayer.
1/30/2013	Tiffany L. Amlot	1.20	1.20				\$ 648.00	Review unredacted pleadings and numerous communications with clients.
2/1/2013	Alan S. Gilbert	0.30	0.30				\$ 249.00	Conference T. Amlot re: response to motion to alter or amend (0.2); review emails re: same (0.1).
2/1/2013	Tiffany L. Amlot	0.80			0.80		\$ 432.00	Communications and review of potential exhibits to Thayer declaration.
2/1/2013	Kristen C. Rodriguez	0.10	0.10				\$ 46.50	Correspondence with T. Amlot regarding response to motion for reconsideration.

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Date	Name / Invoice Number	Hours	Plds, Mtn, Brief	Research	Investigation	Interviewing	Amount	Description
2/3/2013	Kristen C. Rodriguez	11.90	7.90	4.00			\$ 5,533.50	Review and analyze plaintiff's motion to reconsider (1.0); draft response in opposition to plaintiff's motion to reconsider (6.9); research in support of same (4.0).
2/4/2013	Tiffany L. Amlot	5.20		5.20			\$ 2,808.00	Analyze and conduct legal research re: opposition to motion for reconsideration and begin work on brief.
2/5/2013	Kristen C. Rodriguez	0.80	0.80				\$ 372.00	Confer with T. Amlot regarding strategy for motion to reconsider response.
2/5/2013	Tiffany L. Amlot	8.70	8.70				\$ 4,698.00	Draft brief in opposition to motion for reconsideration, including legal research re: same.
2/6/2013	Tiffany L. Amlot	2.90	2.90				\$ 1,566.00	Review and revise opposition brief, including additional research re: district court cases applying standards to insiders.
2/6/2013	Alan S. Gilbert	2.50	2.50				\$ 2,075.00	Review and edit draft response to Rule 59 motion (2.0); conferences T. Amlot re: response (0.5).
2/11/2013	Tiffany L. Amlot	1.60	1.60				\$ 864.00	Review and revise brief in opposition to reconsideration.
2/11/2013	Kristen C. Rodriguez	3.50	3.50				\$ 1,627.50	Edit and finalize response to motion to dismiss.
2/21/2013	Alan S. Gilbert	0.50	0.50				\$ 415.00	Review reply in support of motion to alter or amend judgment and case submitted in support of reply.
2/21/2013	Tiffany L. Amlot	1.10	1.10				\$ 594.00	Review and analyze reply brief and attachment.
2/27/2013	Alan S. Gilbert	0.30	0.30				\$ 249.00	Review order denying motion to alter or amend and emails re: same.
2/27/2013	Tiffany L. Amlot	0.50	0.50				\$ 270.00	Review order denying Thayer's motion and communications re: same.
3/15/2013	Tiffany L. Amlot	0.70					\$ 378.00	Review appeal filings and send communication to client.
3/15/2013	Kristen C. Rodriguez	0.20					\$ 93.00	Attention to correspondence regarding notice of appeal documents.
3/25/2013	Alan S. Gilbert	0.20					\$ 166.00	Conference T. Amlot re: appeal.
4/2/2013	Tiffany L. Amlot	0.60					\$ 324.00	Communication regarding necessary filings and preparation of same.
4/2/2013	Kristen C. Rodriguez	0.80					\$ 372.00	Work on appearance and docketing statement, including review of pertinent appellate court rules regarding same.
4/3/2013	Kristen C. Rodriguez	0.40					\$ 186.00	Finalize disclosure statement, and correspondence with local counsel regarding same.
4/3/2013	Alan S. Gilbert	0.30					\$ 249.00	Attention to filing appeal appearances.
4/3/2013	Tiffany L. Amlot	0.40					\$ 216.00	Review and respond to communications regarding filing appearance and corporate disclosure statement.
4/9/2013	Kristen C. Rodriguez	0.70					\$ 325.50	Research and correspondence regarding designation of joint appendix.
4/9/2013	Tiffany L. Amlot	1.10					\$ 594.00	Analyze documents to be included in the proposed appendix, including telephone conference with court and communications regarding same.
4/9/2013	Alan S. Gilbert	0.40					\$ 332.00	Attention to issue of joint appendix on appeal.
5/7/2013	Alan S. Gilbert	2.00					\$ 1,660.00	Conferences Dentons lawyers re: appellate brief; review plaintiff's appellate brief.
5/9/2013	Kristen C. Rodriguez	2.70					\$ 1,255.50	Review and analyze appellate brief.
5/13/2013	Tiffany L. Amlot	1.30					\$ 702.00	Review and analyze plaintiffs' appellate filings, etc.
5/14/2013	Kristen C. Rodriguez	3.30					\$ 1,534.50	Review and analyze plaintiff's opening brief on appeal, including review of key cases.
5/15/2013	Kristen C. Rodriguez	1.00					\$ 465.00	Review and analyze plaintiff's opening brief on appeal.
5/15/2013	Tiffany L. Amlot	2.30					\$ 1,242.00	Conference with K. Rodriguez regarding response brief strategy (.9); review and analyze previously filed briefs to date (1.4).
5/16/2013	Alan S. Gilbert	2.00					\$ 1,660.00	Conference T. Amlot and K. Rodriguez re: appellate brief; review and edit motion for extension of time.
5/16/2013	Tiffany L. Amlot	1.80					\$ 972.00	Analyze appeal issues and meet with A. Gilbert and K. Rodriguez regarding same.
5/16/2013	Kristen C. Rodriguez	4.60					\$ 2,139.00	Strategy meeting with T. Amlot and A. Gilbert regarding response brief; Review key cases; Draft motion for extension for response brief; Review local rules regarding same.
5/17/2013	Tiffany L. Amlot	0.40					\$ 216.00	Telephone conference with opposing counsel regarding extension of time and communications regarding same.
5/17/2013	Alan S. Gilbert	0.20					\$ 166.00	Emails re: appellate brief.
5/20/2013	Tiffany L. Amlot	0.90					\$ 486.00	Finalize motion for extension of time, including communications with client and local counsel.
5/20/2013	Kristen C. Rodriguez	0.90					\$ 418.50	Finalize and file motion for extension of time; work on research for appellee brief.

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Date	Name / Invoice Number	Hours	Plds, Mtn, Brief	Research	Investigation	Interviewing	Amount	Description
5/21/2013	Tiffany L. Amlot	0.60					\$ 324.00	Review court order regarding extension and discuss strategy for brief.
5/22/2013	Alan S. Gilbert	0.10					\$ 83.00	Conference T. Amlot re: appellate brief.
5/23/2013	Kristen C. Rodriguez	4.80					\$ 2,232.00	Edit and finalize motion for extension of time to file appellate brief; review cases cited by plaintiff.
5/24/2013	Kristen C. Rodriguez	6.20					\$ 2,883.00	Review and analyze qui tam cases cited by plaintiff; draft appellate response brief.
5/24/2013	Tiffany L. Amlot	1.70					\$ 918.00	Review Supreme Court petition and additional legal materials regarding response brief.
5/25/2013	Kristen C. Rodriguez	6.70					\$ 3,115.50	Draft appellate brief.
5/27/2013	Alan S. Gilbert	1.00					\$ 830.00	Review draft appellate brief.
5/28/2013	Alan S. Gilbert	0.70					\$ 581.00	Email to K. Rodriguez and T. Amlot re: appellate brief.
5/29/2013	Alan S. Gilbert	2.00					\$ 1,660.00	Review draft brief and comments to T. Amlot and K. Rodriguez re: same.
6/2/2013	Kristen C. Rodriguez	1.50					\$ 697.50	Review and analyze qui tam cases in support of appellate brief.
6/2/2013	Tiffany L. Amlot	4.80					\$ 2,592.00	Legal research.
6/3/2013	Kristen C. Rodriguez	2.10					\$ 976.50	Draft appellate brief.
6/3/2013	Tiffany L. Amlot	3.60					\$ 1,944.00	Legal research.
6/4/2013	Kristen C. Rodriguez	2.40					\$ 1,116.00	Work on 8th Circuit appellate brief.
6/10/2013	Kristen C. Rodriguez	2.70					\$ 1,255.50	Edit appellate brief.
6/11/2013	Kristen C. Rodriguez	5.90					\$ 2,743.50	Work on appellate brief.
6/11/2013	Alan S. Gilbert	0.40					\$ 332.00	Conference T. Amlot re: appellate brief.
6/11/2013	Tiffany L. Amlot	4.60					\$ 2,484.00	Review and analyze draft brief, including relevant case law.
6/12/2013	Alan S. Gilbert	0.20					\$ 166.00	Conference K. Rodriguez re: appellate brief.
6/12/2013	Kristen C. Rodriguez	7.10					\$ 3,301.50	Edit appellate brief.
6/13/2013	Kristen C. Rodriguez	0.90					\$ 418.50	Correspondence with client regarding OCP allegations; Research for appellate brief.
6/13/2013	Alan S. Gilbert	1.00					\$ 830.00	Review and edit appellate brief.
6/14/2013	Alan S. Gilbert	0.50					\$ 415.00	Conference K. Rodriguez re: appellate brief.
6/14/2013	Kristen C. Rodriguez	0.70					\$ 325.50	Call with clients regarding OCP allegation; call with A. Gilbert regarding edits to brief.
6/15/2013	Alan S. Gilbert	2.00					\$ 1,660.00	Review and edit draft appellate brief and email re: same.
6/15/2013	Kristen C. Rodriguez	0.20					\$ 93.00	Correspondence regarding 8th Circuit Appellate brief.
6/16/2013	Kristen C. Rodriguez	7.50					\$ 3,487.50	Eighth Circuit Appellate brief, including calls with Alan Gilbert regarding same.
6/16/2013	Alan S. Gilbert	0.40					\$ 332.00	Conference K. Rodriguez re: appellate brief.
6/17/2013	Alan S. Gilbert	1.00					\$ 830.00	Review and edit appellate brief; conferences K. Rodriguez, T. Amlot and emails clients re: same.
6/17/2013	Tiffany L. Amlot	1.80					\$ 972.00	Review and revise draft brief.
6/17/2013	Kristen C. Rodriguez	2.40					\$ 1,116.00	Edit appellee brief, including review of client edits and attention to correspondence regarding FPCI protocols.
6/18/2013	Kristen C. Rodriguez	3.40					\$ 1,581.00	Edit appellate brief; confer with M. Farah regarding cite checking.
6/18/2013	Alan S. Gilbert	0.40					\$ 332.00	Conference K. Rodriguez re: appellate brief.
6/18/2013	Mariam A. Farah	8.90					\$ 1,913.50	Read / review appellate brief; cite check cases.
6/19/2013	Mariam A. Farah	9.90					\$ 2,128.50	Read / review appellate brief; cite check and review case law.
6/19/2013	Kristen C. Rodriguez	3.90					\$ 1,813.50	Edit and finalize appellate brief.
6/20/2013	Kristen C. Rodriguez	0.50					\$ 232.50	Prepare revised certificates of service for paper copies; finalize and coordinate service of paper copies.
7/1/2013	Tiffany L. Amlot	1.20					\$ 648.00	Review notice re: oral argument; draft communications re: same; draft court notice of client conflicts, etc.
7/1/2013	Alan S. Gilbert	0.50					\$ 415.00	Review order re: oral argument and dates for possible argument, including conferences T. Amlot and emails client; review letter to court re: argument dates.
7/8/2013	Alan S. Gilbert	1.00					\$ 830.00	Review Thayer reply brief.
7/16/2013	Alan S. Gilbert	0.40					\$ 332.00	Teleconference clients and C. Wilson re: motion for summary judgment and possible property tax relief.
8/19/2013	Tiffany L. Amlot	1.60					\$ 864.00	Analyze and respond to client inquiry re: Plaintiff's communications with Insurance Commissioner.
8/22/2013	Tiffany L. Amlot	0.60					\$ 324.00	Review and analyze written comments provided by plaintiff to the Iowa Board of Medicine.
10/17/2013	Alan S. Gilbert	0.30					\$ 249.00	Conference T. Amlot re: oral argument in 8th Circuit.
10/17/2013	Tiffany L. Amlot	0.80					\$ 432.00	Review correspondence from Eighth Circuit setting oral argument and follow-up to same, including communications with team and client.
10/18/2013	Kristen C. Rodriguez	0.20					\$ 93.00	Correspondence with T. Amlot regarding preparations for oral argument.

Date	Name / Invoice Number	Hours	Plds, Mtn, Brief	Research	Investigation	Interviewing	Amount	Description
10/18/2013	Tiffany L. Amlot	0.50					\$ 270.00	Communications with client and counsel re oral argument, etc.
10/18/2013	Alan S. Gilbert	0.20					\$ 166.00	Attention to appeal argument, including conference T. Amlot.
10/21/2013	Tiffany L. Amlot	2.20					\$ 1,188.00	Begin assembling for review materials for oral argument, etc. (1.7); meeting with M. Rosen regarding research issues (.5).
10/21/2013	Marilyn B. Rosen	3.80					\$ 1,178.00	Met with T. Amlot to receive instruction on case. (.4 hours) Researched similar case pending cert petition, and issues surrounding it. (.4 hours) Read briefs filed in the case. (3 hours)
10/22/2013	Marilyn B. Rosen	6.50					\$ 2,015.00	Finished reading briefs filed in the case and the leading authorities cited. (3 hours) Read cases in other circuits to understand circuit split on pleading issue. (3.5 hours)
10/23/2013	Marilyn B. Rosen	5.80					\$ 1,798.00	Reviewed and wrote a summary of In re Baycol. (1 hour) Shepardized 8th Circuit cases on FCA pleading standard. (1 hour). Researched judges on panel for oral argument. (.3 hours) Checked for decisions in circuits that have yet to weigh in on circuit split (.5 hours) Shepardized decisions from other circuits to check for new authority. (3 hours)
10/23/2013	Tiffany L. Amlot	0.90					\$ 486.00	Communications regarding Eighth Circuit legal development (.6); prepare oral argument form (.3).
10/24/2013	Tiffany L. Amlot	1.20					\$ 648.00	Review briefs, etc. in preparation for oral argument.
10/24/2013	Marilyn B. Rosen	6.60					\$ 2,046.00	Drafted and edited bullet point memo on circuit split over FCA pleading standard. (4 hours) Read and summarized Supreme Court briefs in pending cert petition on FCA pleading standard. (2 hours) Researched opposing party (.6 hours).
10/25/2013	Marilyn B. Rosen	2.70					\$ 837.00	Finished memo and summaries of Supreme Court briefs (1.4 hours). Met with T. Amlot to discuss cases in circuit split, new cases, and next steps. (.8 hours). Researched how to submit supplemental authority in the 8th Circuit. (.5 hours)
10/25/2013	Tiffany L. Amlot	1.50					\$ 810.00	Analyze and consult regarding new cases, including meeting with M. Rosen.
10/25/2013	Alan S. Gilbert	0.50					\$ 415.00	Conference T. Amlot re: preparation for oral argument.
10/28/2013	Marilyn B. Rosen	1.80					\$ 558.00	Drafted letter with supplemental authority to 8th Circuit regarding In re Baycol case.
10/28/2013	Tiffany L. Amlot	1.30					\$ 702.00	Review and analyze case law and potential submission of supplemental authority.
10/29/2013	Tiffany L. Amlot	1.40					\$ 756.00	Review draft letter of supplemental authority (.3); arrange for oral argument preparation, including numerous calls and communications with clients and local counsel (1.1).
10/31/2013	Tiffany L. Amlot	2.10					\$ 1,134.00	Legal research regarding supplemental authority and draft letter notification to court regarding same.
11/1/2013	Tiffany L. Amlot	0.30					\$ 162.00	Conference with A. Gilbert regarding supplemental authority and edit same.
11/1/2013	Marilyn B. Rosen	1.00					\$ 310.00	Updated Circuit Split Summary
11/1/2013	Alan S. Gilbert	1.00					\$ 830.00	Attention to supplemental authority letter to Eighth Circuit, including review of Baycol case and draft letter and conference T. Amlot; reservations in Omaha.
11/4/2013	Alan S. Gilbert	0.40					\$ 332.00	Conference T. Amlot re: appeal.
11/4/2013	Marilyn B. Rosen	1.50					\$ 465.00	Updated summary of circuit split law.
11/4/2013	Tiffany L. Amlot	2.60					\$ 1,404.00	Arrange moot argument, discuss preparation, etc. (2.3); revise and file notice of supplemental authority (.3).
11/5/2013	Marilyn B. Rosen	3.00					\$ 930.00	Updated circuit split research, made chart summary for ease of access.
11/5/2013	Alan S. Gilbert	0.10					\$ 83.00	Review plaintiff's response to Notice of Additional authority.
11/5/2013	Tiffany L. Amlot	0.50					\$ 270.00	Arrange moot argument, etc.
11/6/2013	Tiffany L. Amlot	0.90					\$ 486.00	Oral argument prep, etc.
11/7/2013	Marilyn B. Rosen	1.90					\$ 589.00	Researched difference between (a)(1) and (a)(2) claims in the False Claims Act.
11/8/2013	Tiffany L. Amlot	8.10					\$ 4,374.00	Review case law and briefs to prepare for oral argument.
11/9/2013	Tiffany L. Amlot	2.70					\$ 1,458.00	Review case law and briefs to prepare for oral argument.
11/10/2013	Tiffany L. Amlot	3.40					\$ 1,836.00	Review case law and briefs to prepare for oral argument.
11/11/2013	Marilyn B. Rosen	1.70					\$ 527.00	Researched judicial panel for Eighth Circuit argument

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Date	Name / Invoice Number	Hours	Plds, Mtn, Brief	Research	Investigation	Interviewing	Amount	Description
11/11/2013	Trina L. Morrow	0.30					\$ 69.00	Retrieve MonitorSuite report on 8th Circuit judges and advice on resources for pro bono for Ms. Rosen.
11/11/2013	Tiffany L. Amlot	0.80					\$ 432.00	Communications and oral argument prep.
11/11/2013	Richard L. Fenton	1.20					\$ 996.00	Review briefs.
11/12/2013	Harold C. Hirshman	1.00					\$ 850.00	Read briefs for Amlot moot.
11/12/2013	Alan S. Gilbert	1.50					\$ 1,245.00	Review appellate briefs in preparation for moot of Tiffany Amlot.
11/12/2013	Tiffany L. Amlot	2.90					\$ 1,566.00	Prepare for oral argument.
11/12/2013	Marilyn B. Rosen	0.80					\$ 248.00	Researched Judge Gruender's decision in previous Planned Parenthood decisions.
11/13/2013	Marilyn B. Rosen	1.10					\$ 341.00	Researched other false claims act cases in the 8th Circuit that were heard by judges on panel.
11/13/2013	Marilyn B. Rosen	1.70					\$ 527.00	Moot arguments and discussion of additional research.
11/13/2013	Alan S. Gilbert	1.50					\$ 1,245.00	Moot argument for Tiffany Amlot.
11/13/2013	Harold C. Hirshman	3.00					\$ 2,550.00	Moot argument for T. Amlot.
11/13/2013	Richard L. Fenton	1.90					\$ 1,577.00	Preparation for moot court; moot court with T. Amlot.
11/13/2013	Tiffany L. Amlot	5.70					\$ 3,078.00	Telephone conference with local counsel; telephone conference with client; prepare for moot argument; participate in moot argument; research Eighth Circuit law regarding precedent, etc.
11/13/2013	Kristen C. Rodriguez	3.00					\$ 1,395.00	Prepare for and attend moot court for 8th Circuit argument.
11/14/2013	Tiffany L. Amlot	2.10					\$ 1,134.00	Conference with C. Soper regarding Eighth Circuit; telephone conference with client; additional research for oral argument.
11/15/2013	Tiffany L. Amlot	2.10					\$ 1,134.00	Telephone conference with client regarding HIPPA issues, etc.; more research for oral argument.
11/15/2013	Alan S. Gilbert	0.50					\$ 415.00	Conference T. Amlot re: appellate argument.
11/17/2013	Tiffany L. Amlot	2.80					\$ 1,512.00	Prepare for oral argument.
11/18/2013	Marilyn B. Rosen	0.30					\$ 93.00	Checked for any new case law on the circuit split regarding the pleading standard for False Claims Act cases.
11/18/2013	Alan S. Gilbert	0.80					\$ 664.00	Conference T. Amlot re: oral argument; emails R. Evans.
11/18/2013	Tiffany L. Amlot	1.90					\$ 1,026.00	Prepare for oral argument, talk with Alan, etc.
11/19/2013	Alan S. Gilbert	6.00					\$ 4,980.00	Travel to Omaha for oral argument; conference T. Amlot in preparation for oral argument.
11/19/2013	Tiffany L. Amlot	10.10					\$ 5,454.00	Prepare for oral argument; travel; telephone conference with client regarding new developments, etc.
11/19/2013	Marilyn B. Rosen	0.10					\$ 31.00	Cite checked for any new cases on pleading standard circuit split before oral arguments tomorrow.
11/20/2013	Tiffany L. Amlot	10.80					\$ 5,832.00	Prepare for argument; attend argument; client meetings; return travel.
11/20/2013	Alan S. Gilbert	7.00					\$ 5,810.00	Oral argument before the 8th Circuit; conference clients after argument; travel from Omaha to Chicago.
11/21/2013	Alan S. Gilbert	0.30					\$ 249.00	Conference K. Rodriguez re: oral argument.
11/22/2013	Alan S. Gilbert	0.20					\$ 166.00	Conference T. Amlot.
11/26/2013	Tiffany L. Amlot	1.10					\$ 594.00	Telephone conference with Iowa counsel regarding investigation and follow-up to same.
12/23/2013	Tiffany L. Amlot	0.70					\$ 378.00	Analyze new decision.
1/16/2014	Tiffany L. Amlot	1.20					\$ 714.00	Revise donations policy reminder, including communications re same.
1/19/2014	Alan S. Gilbert	0.30					\$ 261.00	Review new 8th Circuit FCA case and email to team re: same.
1/20/2014	Tiffany L. Amlot	0.70					\$ 416.50	Analyze new decision.
1/27/2014	Alan S. Gilbert	0.20					\$ 174.00	Conferences T. Amlot and K. Rodriguez re: filing notice of additional authority.
1/27/2014	Tiffany L. Amlot	0.90					\$ 535.50	Analyze new case and talk to C. Soper re potential update to court.
1/27/2014	Kristen C. Rodriguez	0.20					\$ 107.00	Call with A. Gilbert regarding supplement of case law.
1/29/2014	Kristen C. Rodriguez	0.40					\$ 214.00	Review 28j letter and case.
1/29/2014	Tiffany L. Amlot	1.20					\$ 714.00	Draft letter of supplemental authority.
1/29/2014	Alan S. Gilbert	0.40					\$ 348.00	Review and edit letter of supplemental authority to Eighth Circuit.
1/30/2014	Tiffany L. Amlot	0.50					\$ 297.50	Edit letter of supplemental authority and communications regarding same.
1/30/2014	Kristen C. Rodriguez	0.20					\$ 107.00	Edit 28j letter.
2/4/2014	Tiffany L. Amlot	0.30					\$ 178.50	Review Thayer's response to notice of supplemental authority.
3/4/2014	Tiffany L. Amlot	1.70					\$ 1,020.00	Analyze proposed policy update and revise same.
5/15/2014	Alan S. Gilbert	0.10					\$ 87.00	Emails client re: litigation hold and appeal ruling.

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Date	Name / Invoice Number	Hours	Plds, Mtn, Brief	Research	Investigation	Interviewing	Amount	Description
5/15/2014	Tiffany L. Amlot	1.20					\$ 720.00	Review litigation hold and respond to correspondence from client addressing numerous inquiries.
6/20/2014	Alan S. Gilbert	0.30					\$ 261.00	Emails to T. Amlot and K. Rodriguez with government certiorari opposition brief in Takeda case.
7/24/2014	Tiffany L. Amlot	0.50					\$ 300.00	Review and analyze recent qui tam decisions.
8/5/2014	Alan S. Gilbert	0.30					\$ 261.00	Conference T. Amlot re: appeal.
8/29/2014	Marilyn B. Rosen	0.60					\$ 207.00	Read 8th circuit opinion and researched time period to move for rehearing or en banc hearing.
8/29/2014	Tiffany L. Amlot	2.80					\$ 1,680.00	Review opinion and respond to media inquiries, including numerous communications regarding same.
8/29/2014	Kristen C. Rodriguez	0.50					\$ 260.00	Review decisions from 8th Circuit and attention to correspondence re: same.
8/29/2014	Alan S. Gilbert	2.00					\$ 1,740.00	Review appellate court opinion and conferences Dentons lawyers re: same; attention to press statement.
9/2/2014	Alan S. Gilbert	0.50					\$ 435.00	Conference T. Amlot and K. Rodriguez re: strategy.
9/2/2014	Kristen C. Rodriguez	0.50					\$ 260.00	Conference with A. Gilbert and T. Amlot regarding results of decision.
9/18/2014	Tiffany L. Amlot	0.30					\$ 180.00	Correspondence with client regarding status and strategy.
9/19/2014	Tiffany L. Amlot	0.50					\$ 300.00	Numerous communications regarding case status and strategy.
9/22/2014	Alan S. Gilbert	0.70	0.70				\$ 609.00	Conferences with T. Amlot regarding strategy on filing of amended complaint and new motion to dismiss.
9/22/2014	Tiffany L. Amlot	0.70	0.70				\$ 420.00	Initial review of correspondence from plaintiffs' counsel with attached pleadings, including consult with A. Gilbert.
9/23/2014	Tiffany L. Amlot	1.10	1.10				\$ 660.00	Analyze proposed amendments to complaint, etc.
9/23/2014	Alan S. Gilbert	0.30	0.30				\$ 261.00	Review redline of proposed amended complaint.
9/24/2014	Alan S. Gilbert	0.90	0.90				\$ 783.00	Conference with T. Amlot regarding amended complaint and motion to dismiss.
9/24/2014	Tiffany L. Amlot	4.50	4.00			0.50	\$ 2,700.00	Telephone conference with A. Gilbert regarding status and strategy (.9); telephone conference with client (.5); additional analysis and comparison of complaints and initial motion to dismiss briefing (3.1).
9/26/2014	Tiffany L. Amlot	0.80	0.80				\$ 480.00	Initial review of filed motion to amend and correspondence with client regarding same.
9/26/2014	Alan S. Gilbert	0.20	0.20				\$ 174.00	Review Thayer motion to amend complaint.
10/6/2014	Tiffany L. Amlot	0.50	0.50				\$ 300.00	Telephone conference with A. Gilbert regarding status.
10/6/2014	Alan S. Gilbert	0.20	0.20				\$ 174.00	Conference T. Amlot.
10/11/2014	Tiffany L. Amlot	0.70	0.70				\$ 420.00	Analyze dismissal arguments and further research needed, and communications re: same.
10/12/2014	Tiffany L. Amlot	3.20		3.20			\$ 1,920.00	Research standards under Rule 15 for amendment and begin drafting opposition brief, including analysis of prior arguments and pleadings.
10/13/2014	Tiffany L. Amlot	2.40	2.40				\$ 1,440.00	Continue assessing status and draft opposition to plaintiff's motion to amend.
10/13/2014	Alan S. Gilbert	0.40	0.40				\$ 348.00	Review draft response to motion to amend and emails T. Amlot regarding same.
10/14/2014	Alan S. Gilbert	0.20	0.20				\$ 174.00	Emails regarding response to motion to amend.
10/14/2014	Tiffany L. Amlot	0.80	0.80				\$ 480.00	Revise brief and finalize for filing, including communications re: same.
10/16/2014	Tiffany L. Amlot	0.50	0.50				\$ 300.00	Numerous conferences re: status and research needed.
10/16/2014	Alan S. Gilbert	0.20					\$ 174.00	Conferences regarding associate staffing.
10/17/2014	Alan S. Gilbert	0.30					\$ 261.00	Conferences regarding staffing.
10/17/2014	Tiffany L. Amlot	1.30	1.30				\$ 780.00	Numerous conferences re: status and research needed.
10/20/2014	Tiffany L. Amlot	1.20	0.50	0.70			\$ 720.00	Analyze reply in support of motion to amend (.5); coordinate with C. Shapiro re: research, background, and status (.7).
10/20/2014	Alan S. Gilbert	0.30	0.30				\$ 261.00	Review plaintiff's reply in support of motion to amend.
10/22/2014	Alan S. Gilbert	0.30	0.30				\$ 261.00	Conference with T. Amlot regarding plaintiff's motion to amend.
10/22/2014	Tiffany L. Amlot	0.20	0.20				\$ 120.00	Telephone conference with A. Gilbert regarding status and strategy.
10/30/2014	Tiffany L. Amlot	1.10	1.10				\$ 660.00	Review case law cited in reply brief.
11/4/2014	Alan S. Gilbert	0.20	0.20				\$ 174.00	Review order from court (0.1); emails re: motion to dismiss (0.1).
11/4/2014	Tiffany L. Amlot	0.30	0.30				\$ 180.00	Review court order regarding motion to amend and follow-up communications regarding same.

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Date	Name / Invoice Number	Hours	Plds, Mtn, Brief	Research	Investigation	Interviewing	Amount	Description
11/4/2014	Corey M. Shapiro	0.50					\$ 300.00	Analysis and review of Third Amended Complaint.
11/5/2014	Corey M. Shapiro	0.40					\$ 240.00	Analysis and review of Third Amended Complaint; review pleadings regarding motion to dismiss.
11/5/2014	Tiffany L. Amlot	0.70	0.70				\$ 420.00	Communications regarding motion to dismiss.
11/5/2014	Alan S. Gilbert	0.20	0.20				\$ 174.00	Emails re: motion to dismiss (0.1); conference T. Amlot (0.1)
11/7/2014	Alan S. Gilbert	2.00	2.00				\$ 1,740.00	Review prior motion to dismiss briefs and court of appeal opinion (.5); meeting with Dentons team re: motion to dismiss (1.5).
11/7/2014	Tiffany L. Amlot	2.20	1.50				\$ 1,320.00	Meeting to discuss strategy for motion to dismiss (1.5).
11/7/2014	Tiffany L. Amlot	0.70	0.70				\$ 420.00	Review prior briefs and circulate structure for revised memo.
11/7/2014	Shannon Y. Shin	2.60					\$ 1,079.00	Review matter materials. Confer with A. Gilbert, T. Amlot and C. Shapiro re strategy pertaining to motion to dismiss.
11/7/2014	Corey M. Shapiro	2.60					\$ 1,560.00	Analysis and review of third amended complaint; strategy regarding motion to dismiss; conference with team regarding same.
11/10/2014	Shannon Y. Shin	2.90					\$ 1,203.50	Review and analyze relevant pleadings and motions in preparation for researching and drafting portions of a motion to dismiss the third amended complaint.
11/11/2014	Shannon Y. Shin	5.10					\$ 2,116.50	Analyze and research false claims act issues raised in third amended complaint.
11/12/2014	Shannon Y. Shin	3.40					\$ 1,411.00	Continue researching false claims act issues in preparation for revising and drafting new portions of motion to dismiss.
11/12/2014	Alan S. Gilbert	0.10					\$ 87.00	Conference T. Amlot re: time for filing motion to dismiss.
11/13/2014	Corey M. Shapiro	0.30					\$ 180.00	Review and respond to emails with S. Shin regarding motion to dismiss.
11/13/2014	Shannon Y. Shin	2.70					\$ 1,120.50	Continue researching false claims act issues and also research applicable state and federal regulations. Confer with C. Shapiro re same. Revise and update motion to dismiss, and draft additional arguments in support of motion to dismiss.
11/13/2014	Mary K. Ciziunas	1.40					\$ 336.00	Research on Iowa Medicaid laws and regulations per S. Shin.
11/14/2014	Mary K. Ciziunas	0.80					\$ 192.00	Research to locate 2006-2008 versions of the Iowa Medicaid Prescribed Drugs Manual per S. Shin.
11/14/2014	Shannon Y. Shin	1.10					\$ 456.50	Review and analyze applicable regulations, and confer with T. Amlot and C. Shapiro re same.
11/14/2014	Corey M. Shapiro	0.50					\$ 300.00	Confer with team regarding motion to dismiss and regulatory issues.
11/14/2014	Tiffany L. Amlot	0.40	0.40				\$ 240.00	Telephone conference with opposing counsel regarding extension (.2); communications regarding same (.2).
11/17/2014	Alan S. Gilbert	0.50	0.50				\$ 435.00	Review draft motion for extension and emails re: same (0.3); conference T. Amlot re: motion to dismiss (0.2)
11/17/2014	Tiffany L. Amlot	2.70	2.70				\$ 1,620.00	Communications with opposing counsel, local counsel and client regarding extension of time, draft motion for extension of time to file motion to dismiss, discuss status of research and drafting.
11/18/2014	Tiffany L. Amlot	0.80	0.20		0.60		\$ 480.00	Review court order (0.2); analyze regulations regarding drug dispensing and communications regarding same (0.6).
11/18/2014	Alan S. Gilbert	0.20	0.20				\$ 174.00	Conference T. Amlot re: motion to dismiss.
11/18/2014	Corey M. Shapiro	1.00					\$ 600.00	Attention to motion to dismiss; conference with team regarding same.
11/18/2014	Shannon Y. Shin	0.40					\$ 166.00	Confer with T. Amlot and C. Shapiro re research done in anticipation of drafting motion to dismiss.
11/19/2014	Tiffany L. Amlot	1.80		1.80			\$ 1,080.00	Communications regarding regulations applicable to drug dispensing and returns (0.5); additional research regarding same (1.3).
11/19/2014	Alan S. Gilbert	0.30			0.30		\$ 261.00	Review prescribed drug regulations for applicability to client.
11/20/2014	Shannon Y. Shin	4.00					\$ 1,660.00	Conduct legal research in preparation for drafting motion to dismiss.
11/21/2014	Tiffany L. Amlot	1.20			1.20		\$ 720.00	Numerous communications regarding applicable regulations.
11/26/2014	Shannon Y. Shin	1.30					\$ 539.50	Continue researching issues raised in Thayer's third amended complaint, and begin drafting motion to dismiss same.
11/28/2014	Shannon Y. Shin	2.70					\$ 1,120.50	Continue drafting motion to dismiss third amended complaint.

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Date	Name / Invoice Number	Hours	Plds, Mtn, Brief	Research	Investigation	Interviewing	Amount	Description
11/29/2014	Shannon Y. Shin	5.60					\$ 2,324.00	Continue drafting motion to dismiss third amended complaint.
11/30/2014	Tiffany L. Amlot	4.20	4.20				\$ 2,520.00	Revise and draft motion to dismiss Third Amended Complaint.
12/1/2014	Alan S. Gilbert	0.70	0.70				\$ 609.00	Conference T. Amlot re: motion to dismiss.
12/1/2014	Tiffany L. Amlot	7.70	7.00				\$ 4,620.00	Continue research and draft memo in support of motion to dismiss (7.0) consult with A. Gilbert re: same (0.7)
12/2/2014	Tiffany L. Amlot	7.80	7.80				\$ 4,680.00	Continue research and draft memo in support of motion to dismiss (7.5); consult with A. Gilbert re: same (.3).
12/2/2014	Alan S. Gilbert	1.70	1.70				\$ 1,479.00	Conferences T. Amlot re: motion to dismiss (0.3); review third amended complaint, documents and cases re: defenses, including possible public disclosure bar (1.4).
12/3/2014	Alan S. Gilbert	2.00	2.00				\$ 1,740.00	Review and edit draft motion to dismiss (1.5); conference T. Amlot re: same (0.5)
12/3/2014	Tiffany L. Amlot	8.30	5.80	2.50			\$ 4,980.00	Continue research (2.5); revise and draft memo in support of motion to dismiss (5.3); consult with A. Gilbert re: same (0.5)
12/4/2014	Tiffany L. Amlot	6.20	6.20				\$ 3,720.00	Continue research, revise, and draft memo in support of motion to dismiss (6.0); consult with A. Gilbert re: same (0.2)
12/4/2014	Kristen C. Rodriguez	0.40	0.40				\$ 208.00	Review motion to dismiss.
12/4/2014	Alan S. Gilbert	2.80	2.80				\$ 2,436.00	Attention to motion to dismiss, including editing draft memorandum (2.6) and conferences T. Amlot (0.2).
12/5/2014	Alan S. Gilbert	1.00	1.00				\$ 870.00	Review local counsel comments on motion to dismiss (.5); review draft motion (0.3); conferences T. Amlot (0.2).
12/5/2014	Tiffany L. Amlot	4.60	4.60				\$ 2,760.00	Draft motion; review and revise brief (3.9); proof and finalize brief and arrange for filing of same (0.5); consults with A. Gilbert (0.2).
12/8/2014	Alan S. Gilbert	0.40	0.40				\$ 348.00	Review new Seventh Circuit FCA case dismissing claims under 9(b).
12/8/2014	Tiffany L. Amlot	1.20	1.20				\$ 720.00	Address filing issues (0.7); review new FCA decision (0.5).
12/16/2014	Alan S. Gilbert	0.70	0.70				\$ 609.00	Conferences T. Amlot re: motion to strike.
12/16/2014	Tiffany L. Amlot	0.60	0.60				\$ 360.00	Review and assess Plaintiff's demand to retract motion to dismiss and threatened motion to strike (0.2), including consult with A. Gilbert (0.1).
12/17/2014	Tiffany L. Amlot	0.30	0.30				\$ 180.00	Review and respond to correspondence from opposing counsel.
12/19/2014	Tiffany L. Amlot	2.80	1.80	1.00			\$ 1,680.00	Research re: defenses to motion to strike (1.0); teleconference with opposing counsel re: meet and confer (0.5); draft correspondence to opposing counsel re: agreed schedule and defenses to motion to strike (0.5); review and revise draft motion received from opposing counsel (0.5); communications with client (0.3).
12/19/2014	Kristen C. Rodriguez	0.50	0.50				\$ 260.00	Call with opposing counsel regarding motion to strike and follow up discussion with T. Amlot regarding response to same.
12/22/2014	Alan S. Gilbert	0.30	0.30				\$ 261.00	Review motion from plaintiffs (0.2); emails T. Amlot re: same (0.1).
12/22/2014	Tiffany L. Amlot	1.10	0.80				\$ 660.00	Review motion to strike (0.8); numerous communications re: schedule, etc (0.3).
12/23/2014	Tiffany L. Amlot	0.70					\$ 420.00	Communications with opposing counsel and court re: proposed briefing schedule, etc.
12/29/2014	Kristen C. Rodriguez	1.40	1.40				\$ 728.00	Review motion to dismiss and motion to strike and cited authorities in preparation for drafting opposition to motion to strike.
1/5/2015	Alan S. Gilbert	0.50	0.50				\$ 457.50	Review plaintiff's motion to strike.
1/7/2015	Kristen C. Rodriguez	2.30	2.30				\$ 1,357.00	Draft motion to strike.
1/8/2015	Kristen C. Rodriguez	0.20	0.20				\$ 118.00	Correspondence with T. Amlot regarding motion to strike.
1/8/2015	Tiffany L. Amlot	0.50	0.50				\$ 335.00	Numerous communications re: response to motion to strike and future case planning.
1/9/2015	Tiffany L. Amlot	0.50	0.50				\$ 335.00	Consult with K. Rodriguez re: opposition to motion to strike.
1/9/2015	Kristen C. Rodriguez	5.00	5.00				\$ 2,950.00	Draft response to motion to strike (4.4); Conference with T. Amlot regarding same (.6).
1/12/2015	Kristen C. Rodriguez	4.30	4.30				\$ 2,537.00	Draft and edit response to motion to strike.
1/14/2015	Alan S. Gilbert	0.20	0.20				\$ 183.00	Conference T. Amlot re: response to motion and staffing.
1/14/2015	Tiffany L. Amlot	0.60	0.60				\$ 402.00	Review motion to strike and draft response.
1/15/2015	Tiffany L. Amlot	2.10	2.10				\$ 1,407.00	Analyze motion to strike and revise draft response brief to same.
1/16/2015	Tiffany L. Amlot	4.20	3.70				\$ 2,814.00	Review and revise response brief to motion to strike (3.5), including consults with A. Gilbert (.2); talk to L. Trachtenberg re: case (.5).

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1/16/2015	Alan S. Gilbert	1.80	1.80				\$ 1,647.00	Review and edit draft response to motion to strike (1.5) and conferences. T. Amlot and K. Rodriguez re: same (0.3)
1/16/2015	Kristen C. Rodriguez	1.00	1.00				\$ 590.00	Edit brief.
1/20/2015	Alan S. Gilbert	0.40	0.40				\$ 366.00	Conferences Dentons lawyers re: response to motion to strike.
1/20/2015	Tiffany L. Amlot	0.30					\$ 201.00	Communications with client and finalize brief.
1/20/2015	Kristen C. Rodriguez	2.00	2.00				\$ 1,180.00	Edit and finalize response to motion to strike.
2/3/2015	Lindsey A. Trachtenberg	2.70					\$ 1,080.00	Review orders and pending motions
2/9/2015	Tiffany L. Amlot	0.60	0.60				\$ 402.00	Analyze plaintiff's reply brief and communications re: same.
2/9/2015	Alan S. Gilbert	0.30	0.30				\$ 274.50	Review plaintiff's reply in support of motion to strike.
2/19/2015	Tiffany L. Amlot	0.50					\$ 335.00	Review decision denying motion to strike and correspondence with client.
3/27/2015	Kristen C. Rodriguez	0.20	0.20				\$ 118.00	Conference with T. Amlot regarding strategy on timing for reply.
3/31/2015	Alan S. Gilbert	0.30	0.30				\$ 274.50	Conference T. Amlot re: reply in support of motion to dismiss.
4/2/2015	Lindsey A. Trachtenberg	0.10					\$ 40.00	Briefly review plaintiff's responses to motion to dismiss
4/2/2015	Alan S. Gilbert	0.60					\$ 549.00	Emails R. Evans (0.2); initial review of response to motion to dismiss and related motions (0.4).
4/3/2015	Lindsey A. Trachtenberg	2.50					\$ 1,000.00	Research 8th Circuit law on Rule 11
4/3/2015	Alan S. Gilbert	0.50	0.50				\$ 457.50	Conferences T. Amlot re: Rule 11 letter and emails R. Evans.
4/3/2015	Tiffany L. Amlot	2.60	2.60				\$ 1,742.00	Analyze objection to evidence and communications regarding same (1.0); begin drafting Rule 11 motion (1.6).
4/5/2015	Lindsey A. Trachtenberg	1.20					\$ 480.00	Review plaintiff's opposition to motion to dismiss
4/6/2015	Tiffany L. Amlot	0.80	0.80				\$ 536.00	Continue drafting Rule 11 motion and correspondence regarding same.
4/6/2015	Alan S. Gilbert	1.00	1.00				\$ 915.00	Review plaintiff's responses to motion to dismiss and draft Rule 11 motion.
4/7/2015	Tiffany L. Amlot	0.40					\$ 268.00	Communications with numerous team members regarding status and strategy.
4/7/2015	Alan S. Gilbert	0.40	0.40				\$ 366.00	Conference T. Amlot re: response to plaintiff's objections to material in motion to dismiss.
4/7/2015	Lindsey A. Trachtenberg	1.20					\$ 480.00	Review third amended complaint and opposition to motion to dismiss to identify issues to research
4/10/2015	Lindsey A. Trachtenberg	2.00					\$ 800.00	Confer with T. Amlot and A. Gilbert re reply brief for motion to dismiss
4/10/2015	Tiffany L. Amlot	4.80	4.50				\$ 3,216.00	Analyze plaintiff's response brief and outline reply issues (2.5); confer with A. Gilbert regarding same (2.0); communications with court regarding deadlines (0.3)
4/10/2015	Alan S. Gilbert	2.00	2.00				\$ 1,830.00	Conference T. Amlot and L. Trachtenberg re: reply in support of motion to dismiss.
4/12/2015	Lindsey A. Trachtenberg	1.60					\$ 640.00	Review recent federal circuit court False Claims Act decisions
4/15/2015	Tiffany L. Amlot	1.50	1.50				\$ 1,005.00	Meeting with team regarding reply brief strategy.
4/15/2015	Lindsey A. Trachtenberg	0.30					\$ 120.00	Continue review of recent False Claims Act cases
4/15/2015	Lindsey A. Trachtenberg	1.30					\$ 520.00	Meet with K. Rodriguez and T. Amlot to discuss preparing reply brief
4/15/2015	Kristen C. Rodriguez	1.70	1.70				\$ 1,003.00	Prepare for and attend team meeting regarding reply in support of motion to dismiss.
4/16/2015	Kristen C. Rodriguez	0.20	0.20				\$ 118.00	Correspondence regarding reply length.
4/16/2015	Lindsey A. Trachtenberg	1.90					\$ 760.00	Research page limit for reply brief (0.30); research definitions of practitioner and order of physician (1.0); research requirement on usage of supply of pills before refill (0.6)
4/20/2015	Lindsey A. Trachtenberg	1.50					\$ 600.00	Review and distinguish cases cited by plaintiff re patient-practitioner relationship
4/21/2015	Lindsey A. Trachtenberg	2.90					\$ 1,160.00	Research case law and Iowa regulations to reply to Plaintiff's argument re double billing on returned bills (2.3); draft section of reply brief on same (0.6)
4/21/2015	Kristen C. Rodriguez	1.50	1.50				\$ 885.00	Work on reply brief by reviewing prior briefs.
4/22/2015	Kristen C. Rodriguez	3.00	3.00				\$ 1,770.00	Work on reply brief.
4/22/2015	Lindsey A. Trachtenberg	1.40					\$ 560.00	In support of reply brief, research Iowa law on statutory interpretation and history of an Iowa regulation
4/23/2015	Lindsey A. Trachtenberg	0.70					\$ 280.00	Research application of certain Iowa regulations to family planning clinics
4/23/2015	Kristen C. Rodriguez	3.30	3.30				\$ 1,947.00	Work on reply brief.
4/24/2015	Kristen C. Rodriguez	5.70	5.70				\$ 3,363.00	Work on reply brief.
4/25/2015	Lindsey A. Trachtenberg	1.30					\$ 520.00	Research 8th Circuit law re additional allegations included in opposition to motion to dismiss
4/27/2015	Kristen C. Rodriguez	1.20	1.20				\$ 708.00	Work on reply brief.

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4/27/2015	Tiffany L. Amlot	2.70	2.70				\$ 1,809.00	Review reply draft and conferences regarding edits to same.
4/28/2015	Tiffany L. Amlot	7.10	7.10				\$ 4,757.00	Revise reply brief, communications with client, etc.
4/28/2015	Kristen C. Rodriguez	3.90	3.90				\$ 2,301.00	Work on reply brief.
4/29/2015	Kristen C. Rodriguez	4.40	4.40				\$ 2,596.00	Work on reply brief.
4/29/2015	Tiffany L. Amlot	3.40	3.40				\$ 2,278.00	Revise reply brief and associated filings, including conferences regarding same and review of client documents.
4/29/2015	Alan S. Gilbert	2.00	2.00				\$ 1,830.00	Review draft reply in support of motion to dismiss and conferences Dentons lawyers re: same.
4/29/2015	Lindsey A. Trachtenberg	2.20					\$ 880.00	Begin cite checking reply brief (0.7); draft motion for excess pages for reply brief (1.5)
4/30/2015	Lindsey A. Trachtenberg	5.90					\$ 2,360.00	Cite check reply brief and create table of contents and table of authorities
4/30/2015	Tiffany L. Amlot	0.90	0.90				\$ 603.00	Revise briefs regarding reply and communications regarding same.
5/1/2015	Lindsey A. Trachtenberg	0.70					\$ 280.00	Finalize reply brief and motion for additional pages for filing
5/1/2015	Alan S. Gilbert	1.00	1.00				\$ 915.00	Review response to plaintiff's objections and conference with T. Amlot regarding same.
5/1/2015	Tiffany L. Amlot	5.20	5.20				\$ 3,484.00	Finish drafting, reviewing and revising pleadings for filing, including conferences re: same.
5/1/2015	Kristen C. Rodriguez	2.50	2.50				\$ 1,475.00	Review and finalize motion to dismiss reply and ancillary filings.
5/12/2015	Lindsey A. Trachtenberg	0.10					\$ 40.00	Review plaintiff-relator's resistance to motion for attorney's fees
5/12/2015	Alan S. Gilbert	0.40	0.40				\$ 366.00	Review plaintiff reply to our response to her objection and email re: same.
5/12/2015	Kristen C. Rodriguez	0.40					\$ 236.00	Review filing regarding motion to dismiss authorities.
5/13/2015	Tiffany L. Amlot	1.10	1.10				\$ 737.00	Analyze Plaintiffs' filing and draft suggested strategy re: same.
7/17/2015	Lindsay F. Ditlow	0.20					\$ 35.00	Review status with B. Cousin
10/8/2015	Alan S. Gilbert	0.50			0.50		\$ 457.50	Emails and teleconference client.
10/21/2015	Kristen C. Rodriguez	0.50		0.50			\$ 295.00	Review petition for cert in FCA case and correspondence regarding same.
10/21/2015	Alan S. Gilbert	1.00		0.50			\$ 915.00	Review AT&T certiorari petition and amicus brief regarding circuit split in need to show a fraudulent claim in an FCA case; e-mail to Dentons lawyers regarding same.
5/12/2016	Alan S. Gilbert	0.40		0.40			\$ 384.00	Review new FCA case from the Second Circuit and e-mail T. Amlot and K. Rodriguez regarding same.
5/25/2016	Tiffany L. Amlot	0.40					\$ 268.00	Review and respond to correspond regarding Thayer article.
5/26/2016	Tiffany L. Amlot	0.40					\$ 268.00	Planned Parenthood/Thayer - Review and respond to correspondence from client regarding Thayer article.
5/27/2016	Tiffany L. Amlot	0.50					\$ 335.00	Review and respond to communications regarding draft media release.
6/21/2016	Tiffany L. Amlot	1.40					\$ 938.00	Analyze court order and draft communications re: same.
6/22/2016	Alan S. Gilbert	3.00	0.70				\$ 2,880.00	Review court's decision on motion to dismiss (0.7); conference T. Amlot re: strategy on remainder of case (1.5); email R. Evans (0.5)
6/22/2016	Tiffany L. Amlot	2.10					\$ 1,407.00	Conferences re strategy (1.5); review and respond to client inquiries (.6).
6/22/2016	Lindsey A. Trachtenberg	1.00					\$ 420.00	Review order on motion to dismiss
6/23/2016	Tiffany L. Amlot	1.20					\$ 804.00	Conferences re status and strategy.
6/23/2016	Stacey E. Petrek	0.40					\$ 118.00	Conferred with T. Amlot. Accepted assignment, received context about the case, and discussed trip to Iowa.
6/24/2016	Stacey E. Petrek	1.00					\$ 295.00	Prepared for and attended meeting with T. Amlot to discuss context of the case, and my upcoming research assignment, as well as the answer I will draft to the plaintiff's complaint.
6/24/2016	Tiffany L. Amlot	2.30	0.80				\$ 1,541.00	Numerous communications with client (0.5); confer with S. Petrek re: status and strategy (1.0); begin preparation of answer document (0.8).
6/24/2016	Stacey E. Petrek	2.70					\$ 796.50	Reviewed motion to dismiss for Iowa ex. rel Susan Thayer v. Planned Parenthood and Third Amended Complaint in preparation for conference with T. Amlot (1.7). Drafted outline of key points (1.0).
6/24/2016	Stacey E. Petrek	0.60					\$ 177.00	Reviewed motion to dismiss for Iowa ex. rel. Susan Thayer v. Planned Parenthood.
6/27/2016	Tiffany L. Amlot	0.70					\$ 469.00	Communications with opposing counsel (0.4); communications with client (0.3).

Time Entry Records in
United States ex rel. Thayer v. Planned Parenthood of the Heartland

Date	Name / Invoice Number	Hours	Plds, Mtn, Brief	Research	Investigation	Interviewing	Amount	Description
6/28/2016	Stacey E. Petrek	0.40					\$ 118.00	Corresponded with and planned logistics of trip to Iowa with T. Amlot (0.3). Received loaner laptop (0.1).
6/28/2016	Alan S. Gilbert	0.30				0.30	\$ 288.00	Conference to T. Amlot re. interviews with clients
6/28/2016	Tiffany L. Amlot	0.90					\$ 603.00	Communications with client (0.5); conference call with local counsel re: status and strategy (0.4).
6/28/2016	Stacey E. Petrek	0.20					\$ 59.00	Corresponded with T. Amlot about scheduling for upcoming trip for Iowa.
6/29/2016	Stacey E. Petrek	15.00					\$ 4,425.00	Travelled to Des Moines, Iowa with T. Amlot. Interviewed fact witnesses at Planned Parenthood to assess defensive strategy and e-possible discovery issues. Drafted notes of factual discovery from interviewees, as well as assessment of their possible efficacy as witnesses. Met with general counsel for Planned Parenthood. Conferred with T. Amlot as to findings and strategy.
6/29/2016	Tiffany L. Amlot	13.80				13.80	\$ 9,246.00	Travel to Des Moines and conduct interviews, etc.
6/30/2016	Tiffany L. Amlot	3.30					\$ 2,211.00	Conferences with team regarding status and strategy (0.5); teleconference with opposing counsel (0.5); draft motion for extension of time (2.0); review and respond to correspondence regarding same (0.3).
6/30/2016	Stacey E. Petrek	0.60					\$ 177.00	Transferred Planned Parenthood notes from laptop computer (with help from IT) (0.1). Edited notes in preparation for meeting with T. Amlot and A. Gilbert (0.5)
6/30/2016	Stacey E. Petrek	1.10					\$ 324.50	Prepared for and attended meeting with T. Amlot and A. Gilbert (0.5). Summarized findings from interviews and formulated defense strategy (0.5). Planned future research assignment regarding the False Claims Act (0.1)
6/30/2016	Stacey E. Petrek	1.00					\$ 295.00	Drafted notes and impressions of witnesses for defense strategy file.
6/30/2016	Alan S. Gilbert	1.20	0.70			0.50	\$ 1,152.00	Conference with T. Amlot and Stacey Petrak regarding meetings with client and case strategy (0.5); review draft motion for extension (0.7).
7/1/2016	Stacey E. Petrek	1.30					\$ 383.50	Drafted notes from Planned Parenthood interviews (1.0). Drafted impressions of witness credibility and efficacy (0.3).
7/5/2016	Stacey E. Petrek	5.40					\$ 1,593.00	Drafted notes from Planned Parenthood interviews into a cohesive defense strategy memo (1.5). Incorporated my impressions as to the efficacy of the witnesses, and best next steps for proceeding with litigation preparation (0.8). Performed research on recent Supreme Court case as suggested by T. Amlot to provide context (2.5). Performed additional research to complete notes (0.6).
7/11/2016	Stacey E. Petrek	0.50					\$ 147.50	Performed legal research on False Claims Act using Westlaw.
7/12/2016	Stacey E. Petrek	3.10					\$ 914.50	Researched elements of a cause of action under the False Claims Act (1.5). Reviewed treatises focusing on possible defenses (1.0). Drafted research findings (0.6).
7/12/2016	Stacey E. Petrek	0.40					\$ 118.00	Reviewed opinion on motion to dismiss (0.2). Noted specific Federal Claims Act allegations to direct further research (0.2).
7/13/2016	Stacey E. Petrek	3.50					\$ 1,032.50	Reviewed plaintiff's third amended complaint (0.3). Researched elements of the False Claims Act (2.7) Corresponded with T. Amlot and G. Gilbert to coordinate meeting to confer about research status (0.5).
7/14/2016	Alan S. Gilbert	1.00		1.00			\$ 960.00	Conference S. Petrek re: research on responding to complaint
7/14/2016	Stacey E. Petrek	1.10					\$ 324.50	Prepared for and attended conference with Alan Gilbert regarding research on the False Claims Act and possible defenses.
7/14/2016	Stacey E. Petrek	1.50					\$ 442.50	Performed research on the False Claims Act and possible defenses (1.0). Drafted bullet points in preparation for discussion with Alan Gilbert (0.5).
7/18/2016	Stacey E. Petrek	2.50					\$ 737.50	Performed research on False Claims Act defenses on Westlaw and Bloomberg law (1.0). Drafted outline of possible defenses (0.5). Reviewed plaintiff's complaint in light of possible defenses, to begin to tailor defenses to our instant case (0.4). Researched case law on the False Claims Act (0.6): both Eighth Circuit and national.

Time Entry Records in
United States ex rel. Thayer v. Planned Parenthood of the Heartland

Date	Name / Invoice Number	Hours	Plds, Mtn, Brief	Research	Investigation	Interviewing	Amount	Description
7/18/2016	Stacey E. Petrek	1.20					\$ 354.00	Drafted and organized notes from fact-finding witness interviews into memo form (0.7). Drafted an assessment of the interviewees as possible witnesses (0.5).
7/19/2016	Stacey E. Petrek	3.10					\$ 914.50	Drafted notes from fact-witness interviews and witness assessment memo (2.0). Performed preliminary revisions on memo (1.1).
7/19/2016	Stacey E. Petrek	1.50					\$ 442.50	Prepared for and attended status conference with Alan Gilbert and Tiffany Amlot. Presented current research on False Claims Act. Discussed defensive strategy and direction for further research.
7/19/2016	Stacey E. Petrek	1.50					\$ 442.50	Reviewed and organized research on False Claims Act (1.2). Prepared presentation of possible defenses to False Claims Act for Alan Gilbert and Tiffany Amlot (0.3).
7/19/2016	Alan S. Gilbert	1.40		1.40			\$ 1,344.00	Conference T. Amlot and Stacey Petrek re: answer and defenses to complaint
7/19/2016	Tiffany L. Amlot	1.20		1.20			\$ 804.00	Conference re: status and strategy, etc.
7/20/2016	Stacey E. Petrek	5.80					\$ 1,711.00	Drafted memo regarding fact witness interviews and witness assessment (3.2). Performed revisions on memo (1.8). Researched aspects of verbal testimony as needed to provide factual basis (i.e. clinic names, medication names, full names of employees etc) (0.8).
7/21/2016	Stacey E. Petrek	5.50					\$ 1,622.50	Performed revisions to Planned Parenthood memo based on feedback from M. Rosen and A. Graham (3.3). Performed research as necessary to provide context for oral interviews (1.7). Reviewed MTD to include remaining counts in plaintiff's complaint, to compare against the facts we gathered from the interviews (0.5).
7/21/2016	Stacey E. Petrek	1.00					\$ 295.00	Reviewed feedback from A. Graham and M. Rosen on Planned Parenthood memo (0.8). Corresponded in terms of follow up questions regarding form of the fact-witness interview memo, and reviewed responses (0.2).
7/21/2016	Lindsey A. Trachtenberg	0.10					\$ 42.00	Check deadline on answer, and plan to draft answer
7/22/2016	Lindsey A. Trachtenberg	4.80					\$ 2,016.00	Review complaint and begin drafting answer (4.4); research deadlines for Rule 26(f) conference and initial disclosures (0.4)
7/22/2016	Stacey E. Petrek	3.70					\$ 1,091.50	Revised Planned Parenthood interview and witness assessment memo (3.6). Made memo available to Tiffany Amlot (.1).
7/22/2016	Stacey E. Petrek	0.70					\$ 206.50	Revised Planned Parenthood memo based on comments from A. Graham and M. Rosen.
7/22/2016	Alan S. Gilbert	0.30	0.30				\$ 288.00	Conference T. Amlot re: answer
7/22/2016	Tiffany L. Amlot	2.30					\$ 1,541.00	Draft correspondence to client; conferences with L. Trachtenberg and A. Gilbert re: status and strategy.
7/25/2016	Stacey E. Petrek	0.50					\$ 147.50	Performed research via Westlaw on both eighth circuit and national law regarding the use of past governmental audits as a possible defense under the False Claims Act.
7/25/2016	Lindsey A. Trachtenberg	0.80					\$ 336.00	Review memo by S. Petrek re witness interviews (0.4); read article re False Claims Act (0.4)
7/26/2016	Stacey E. Petrek	3.70					\$ 1,091.50	Performed research regarding whether a governmental audit can be a defense under the False Claims Act. Conducted Westlaw and Bloomberg searches for case law specific to the Eighth Circuit and National case law. Also consulted treatises on FCA defenses.
7/26/2016	Stacey E. Petrek	2.10					\$ 619.50	Drafted correspondence memo to T. Amlot regarding research findings on audits as a possible defense under the False Claims Act.
7/26/2016	Lindsey A. Trachtenberg	2.00					\$ 840.00	Continue drafting answer (1.5); continue researching jurisdictional issues (0.5)
7/27/2016	Tiffany L. Amlot	0.90	0.90				\$ 603.00	Review initial answer and research defenses (0.5); collect factual assertions for client review (0.2); numerous communications with client (0.2).
7/27/2016	Stacey E. Petrek	4.70					\$ 1,386.50	Performed additional research on audits pertaining to defenses for FCA litigation in the Eighth Circuit (3.8). Drafted email memo to Tiffany Amlot regarding findings (0.5). Revised draft email (0.3). Received feedback on email from M. Rosen (0.1).
7/27/2016	Lindsey A. Trachtenberg	2.40					\$ 1,008.00	Continue drafting answer (1.3); research potential additional defenses (1.1)

Time Entry Records in
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Date	Name / Invoice Number	Hours	Plds, Mtn, Brief	Research	Investigation	Interviewing	Amount	Description
7/28/2016	Stacey E. Petrek	5.20					\$ 1,534.00	Reviewed feedback from Marilyn Rosen regarding memo (0.4). Revised research memo on audits as a possible defense to an FCA action based on feedback (4.8). Transposed memo into an email form. Switched citations from footnotes into inline.
7/28/2016	Tiffany L. Amlot	0.60					\$ 402.00	Communications with client.
7/29/2016	Tiffany L. Amlot	0.50		0.50			\$ 335.00	Analyze legal research re: defenses.
7/29/2016	Alan S. Gilbert	0.30		0.30			\$ 288.00	Emails re: FCA research
7/29/2016	Lindsey A. Trachtenberg	4.20					\$ 1,764.00	Research public disclosure bar and government knowledge defense to False Claims Act claims
8/1/2016	Alan S. Gilbert	1.20			0.70		\$ 1,152.00	Teleconference Roger Evans (0.5); emails re: protective order (0.7)
8/1/2016	Lindsey A. Trachtenberg	0.40					\$ 168.00	Continue research re public disclosure bar
8/1/2016	Tiffany L. Amlot	3.10	2.90				\$ 2,077.00	Analyze and revise answer and defenses (2.9); conferences with A. Gilbert and L. Trachtenberg re: status and strategy (0.2).
8/1/2016	Patrick S. Kabat	0.90					\$ 378.00	Circulate update regarding new privacy case.
8/2/2016	Tiffany L. Amlot	6.30	3.30	1.50	0.70		\$ 4,221.00	Continue review and revise draft answer (3.3); analyze legal research and discuss strategy re: same (1.5); numerous communications re: staffing issues (0.5); review communication and proposed protective order from opposing counsel (0.4); communications with local counsel re: same (0.3); communications with client (0.3).
8/3/2016	Tiffany L. Amlot	3.10	0.80	1.00			\$ 2,077.00	Teleconference with client (0.3); numerous communications with client (0.6); analyze numerous legal research issues (1.0); review and revise answer (0.8); communications with team re: status and strategy (0.4).
8/3/2016	Lindsey A. Trachtenberg	3.80					\$ 1,596.00	Confer with T. Amlot re answer (0.2); continue research re public disclosure bar and other defenses (3.6)
8/4/2016	Tiffany L. Amlot	5.40	2.00	1.00	1.60		\$ 3,618.00	Teleconference with local counsel re: upcoming status and strategy, draft answer, etc (0.5); review initial audit materials and communication re: same (1.2); analyze comments and potential revisions to draft protective order (0.4); analyze previous scheduling orders from Judge (0.3); review and revise answer (2.0); review various legal research (1.0).
8/4/2016	Alan S. Gilbert	2.00	1.40	0.60			\$ 1,920.00	Review draft answer and conferences T. Amlot re: same (1.4); review research on FCA issues (0.6)
8/4/2016	Lindsey A. Trachtenberg	2.40					\$ 1,008.00	Research retroactivity of amendments to public disclosure bar
8/5/2016	Alan S. Gilbert	0.50	0.50				\$ 480.00	Conferences T. Amlot re: answer and other issues in preparation for hearing with magistrate
8/5/2016	Lindsey A. Trachtenberg	0.40					\$ 168.00	Proofread answer
8/5/2016	Tiffany L. Amlot	6.10					\$ 4,087.00	Multiple conferences with client.
8/8/2016	Alan S. Gilbert	0.30			0.30		\$ 288.00	Review orders from court following status conference
8/8/2016	Tiffany L. Amlot	1.30			1.30		\$ 871.00	Prepare for and participate in court conference.
8/17/2016	Alan S. Gilbert	0.20			0.20		\$ 192.00	Conference with T. Amlot regarding strategy.
8/17/2016	Tiffany L. Amlot	2.60			2.60		\$ 1,742.00	Draft ESI Protocol.
8/18/2016	Alan S. Gilbert	0.20			0.20		\$ 192.00	Review draft ESI protocol and e-mails regarding same.
8/18/2016	Tiffany L. Amlot	3.90			3.40		\$ 2,613.00	Continue drafting proposed ESI protocol and communications re: same (2.2); numerous communications w/T. Lu re: status (0.5); begin revising proposed confidentiality order (0.4); draft correspondence to opposing counsel re: proposed orders (0.5); correspondence w/client (0.3).
8/18/2016	Patrick S. Kabat	5.90					\$ 2,478.00	Research and draft circumvention section of reply brief.
8/19/2016	Patrick S. Kabat	6.20					\$ 2,604.00	Heartland continue drafting reply brief; draft introduction.
8/19/2016	Tiffany L. Amlot	2.90			2.90		\$ 1,943.00	Review and revise FOIA request re: audits (1.4); draft and revise proposed confidentiality orders (0.7); draft correspondence to opposing counsel re: proposed orders (0.8).
8/20/2016	Patrick S. Kabat	5.80					\$ 2,436.00	Complete drafting reply brief.
8/21/2016	Patrick S. Kabat	3.20					\$ 1,344.00	Revise introduction and guideline section of reply brief.
8/22/2016	Patrick S. Kabat	3.70					\$ 1,554.00	Incorporate client revisions to brief.
8/22/2016	Alan S. Gilbert	1.50			1.50		\$ 1,440.00	Attention to draft protective order, including conferences with T. Amlot re: same
8/22/2016	Tiffany L. Amlot	2.10			2.10		\$ 1,407.00	Numerous communications re ESI Protocol and confidentiality order; review and revise same.
8/23/2016	Tiffany L. Amlot	0.60			0.60		\$ 402.00	Work on ESI protocol and confidentiality order.

Time Entry Records in
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Date	Name / Invoice Number	Hours	Plds, Mtn, Brief	Research	Investigation	Interviewing	Amount	Description
8/23/2016	Patrick S. Kabat	5.30					\$ 2,226.00	Revise and finalize reply brief.
8/24/2016	Tiffany L. Amlot	1.80			1.80		\$ 1,206.00	Communications re litigation hold, defense and proposed agreed orders.
8/25/2016	Tiffany L. Amlot	3.60			3.60		\$ 2,412.00	Communications and revisions to Protective Order and ESI protocol.
8/26/2016	Tiffany L. Amlot	1.20			1.20		\$ 804.00	Communications and revisions to Protective Order and ESI protocol.
8/28/2016	Patrick S. Kabat	1.90					\$ 798.00	Counsel client regarding administrative procedure act and proposed revisions to reply brief.
8/29/2016	Alan S. Gilbert	0.40			0.40		\$ 384.00	Review proposed changes to protective order and emails re: same
8/29/2016	Tiffany L. Amlot	2.40			2.40		\$ 1,608.00	Communications and revisions to Protective Order and ESI protocol.
8/30/2016	Tiffany L. Amlot	3.30			3.30		\$ 2,211.00	Finish correspondence and revisions re: Protective Order and ESI protocol; proof and file same.
8/31/2016	Patrick S. Kabat	8.10					\$ 3,402.00	Incorporate client comments, revise and finalize reply brief.
9/2/2016	Tiffany L. Amlot	0.70					\$ 469.00	Teleconference with client.
9/9/2016	Alan S. Gilbert	0.50					\$ 480.00	Conference T. Amlot re: strategy
9/15/2016	Patrick S. Kabat	3.60					\$ 1,512.00	Review sixth amended complaint, strategize defenses, prepare for strategy meeting.
9/15/2016	Tiffany L. Amlot	1.30					\$ 871.00	Review initial standing order documents (0.3); correspondence with client (0.2); teleconference with T. Lu re: status and strategy (0.5); correspondence with opposing counsel re: standing orders (0.3).
9/15/2016	Tony K. Lu	0.80					\$ 272.00	Conduct initial review of 8th Circuit decision and order on motion to dismiss (.3); Teleconference with Tiffany Amlot re: status of case and assignment related to initial disclosures (.5)
9/16/2016	Tony K. Lu	0.70			0.70		\$ 238.00	Start draft of initial disclosures pursuant to Rule 26(.7);
9/18/2016	Tony K. Lu	0.60	0.30		0.30		\$ 204.00	Revise draft of initial disclosures (.3); Review local rules and draft motion for admission pro hac vice (.3).
9/19/2016	Patrick S. Kabat	3.90					\$ 1,638.00	Prepare for and participate in moot oral argument.
9/21/2016	Tiffany L. Amlot	0.60	0.60				\$ 402.00	Correspondence with opposing counsel re: court submission.
9/21/2016	Tony K. Lu	0.40	0.20				\$ 136.00	Continue review of district court decision to gain background familiarity concerning case (.2); Revise draft of pro hac vice motion and form (.2)
9/22/2016	Tiffany L. Amlot	3.60	3.50				\$ 2,412.00	Review and revise proposed motion to court (2.5); correspondence with opposing counsel re: same (0.5); arrange for filing of same (0.1); teleconference with client (0.5)
9/23/2016	Alan S. Gilbert	0.30			0.30		\$ 288.00	Review draft initial disclosures and email T. Amlot re: same
9/23/2016	Tiffany L. Amlot	2.60			2.60		\$ 1,742.00	Teleconference with client (1.0); review and revise draft initial disclosures (1.1); correspondence to team re: same (.5)
9/23/2016	Tony K. Lu	0.20			0.20		\$ 68.00	Review standing orders and revised initial disclosures (.2)
9/26/2016	Patrick S. Kabat	3.80					\$ 1,596.00	Develop and circulate potential questions and answers for oral argument.
9/27/2016	Patrick S. Kabat	3.30					\$ 1,386.00	Prepare for oral argument.
9/27/2016	Tiffany L. Amlot	1.70			1.70		\$ 1,139.00	Communications with client
9/28/2016	Tiffany L. Amlot	1.80			1.80		\$ 1,206.00	Teleconference with client IT
9/28/2016	Patrick S. Kabat	4.10					\$ 1,722.00	Prepare for and attend oral argument.
9/28/2016	Alan S. Gilbert	0.50			0.50		\$ 480.00	Conference T. Amlot re: initial disclosures
9/29/2016	Alan S. Gilbert	0.80			0.80		\$ 768.00	Conference T. Amlot re: initial disclosures, document issues and other matters
9/29/2016	Tiffany L. Amlot	2.40			2.40		\$ 1,608.00	Conference with A. Gilbert re: strategy (0.8); teleconference with client (0.5); revise initial disclosures (0.8); draft correspondence to client(0.3).
9/29/2016	Tony K. Lu	0.20			0.20		\$ 68.00	Conduct initial review of medical protocols and count of ab visits (.2)
10/1/2016	Patrick S. Kabat	3.10					\$ 1,302.00	Outline and draft answer.
10/2/2016	Patrick S. Kabat	4.40					\$ 1,848.00	Legal research regarding admissions and counterclaims; complete drafting answer.
10/3/2016	Patrick S. Kabat	1.90					\$ 798.00	Draft and revise Answer.
10/3/2016	Tony K. Lu	1.00			1.00		\$ 340.00	Email follow-up with client (.1); Attention to initial disclosures, prepare cover letter and arrange for service of documents (.9)
10/3/2016	Alan S. Gilbert	0.30			0.30		\$ 288.00	Review plaintiff's initial disclosures
10/4/2016	Tony K. Lu	0.60		0.50	0.10		\$ 204.00	Attention to, download, and initial review of initial disclosure documents (.1); Review and analyze research related to jurisdictional bar defense and audit summary (.5)

Date	Name / Invoice Number	Hours	Plds, Mtn, Brief	Research	Investigation	Interviewing	Amount	Description
10/4/2016	Tiffany L. Amlot	0.50			0.50		\$ 335.00	Initial review of plaintiff disclosures (0.2) and correspondence w/T. Lu re: same (0.3).
10/5/2016	Alan S. Gilbert	1.00			1.00		\$ 960.00	Conference with T. Amlot and T. Lu regarding initial disclosures and strategic issues.
10/5/2016	Tony K. Lu	1.60	1.10		0.50		\$ 544.00	PPH - Review and analyze complaint and answer and medical protocols in preparation for conference call (.6); Participate in teleconference with initial disclosure and summary judgment strategy with T. Amlot and A. Gilbert (1)
10/5/2016	Tiffany L. Amlot	2.20	0.50		1.50		\$ 1,474.00	Analyze Plaintiff's disclosures (0.5); analyze documents from client re: standing orders (0.5); team call re: status and strategy (1.0); review past filings and orders re: prescription claim (.2).
10/6/2016	Tiffany L. Amlot	1.10			1.10		\$ 737.00	Communications with P. Dickey
10/6/2016	Tony K. Lu	0.50			0.50		\$ 170.00	Participate in teleconference with Penny Dickey and T. Amlot (.5)
10/7/2016	Tony K. Lu	1.10			1.10		\$ 374.00	Review local rules in S.D. Iowa, draft discovery plan and scheduling order and joint agenda for scheduling conference (1.1)
10/7/2016	Tiffany L. Amlot	0.40			0.40		\$ 268.00	Prepare documents for initial disclosures (0.2); communications with T. Lu re: status (0.2).
10/9/2016	Tony K. Lu	0.30			0.30		\$ 102.00	Review bates labeled documents and prepare correspondence to counsel for service of standing orders (.3)
10/11/2016	Tiffany L. Amlot	1.40					\$ 938.00	Revise draft agenda; communications w/opposing counsel re: same; revise and file same.
10/11/2016	Tony K. Lu	0.20	0.20				\$ 68.00	Teleconference with T. Amlot re: staggered summary judgment and theory re: same (.2)
10/12/2016	Tony K. Lu	1.00		1.00			\$ 340.00	Start review of Iowa Code Statute, district court decision, and case law pertaining to possible early dispositive motion on standing order issue (1).
10/13/2016	Tony K. Lu	4.20		2.30	1.80		\$ 1,428.00	Start draft responses to plaintiff's first request for production of documents (1.8); Continue research and review of pertinent case law in connection with standing order dispositive motion (2.3); Telephone with court clerk re: confirmation of status conference (.1)
10/13/2016	Tiffany L. Amlot	0.40			0.40		\$ 268.00	Analyze initial discovery requests and objections to same.
10/13/2016	Patrick S. Kabat	1.10					\$ 462.00	Research and revise affirmative defenses.
10/14/2016	Tony K. Lu	0.30			0.30		\$ 102.00	Continue revisions to responses to first request for production (.3)
10/17/2016	Tony K. Lu	2.40			2.40		\$ 816.00	Continue review and analyze relevant case law and claims in support of possible partial motion for summary judgment (1); Continue draft and revision of response to request for production and compile list of document requests of the same (1.4)
10/19/2016	Tony K. Lu	0.40					\$ 136.00	Participate in teleconference with the court concerning joint status conference (.4)
10/19/2016	Tiffany L. Amlot	0.90					\$ 603.00	Prepare for and attend court call.
10/21/2016	Patrick S. Kabat	0.80					\$ 336.00	Analyze final opinion.
10/27/2016	Tony K. Lu	0.30		0.30			\$ 102.00	Continue review and research of case law in support of Planned Parenthood partial summary judgment issue (.3)
10/28/2016	Tony K. Lu	1.50		1.50			\$ 510.00	Continue review of case law and policies in connection with issue of partial summary judgment and standing orders (1.5)
11/1/2016	Tony K. Lu	0.30			0.30		\$ 102.00	Review docket and identify attorneys in response to FOIA inquiry from Mike Falstrom (0.3)
11/9/2016	Patrick S. Kabat	2.10					\$ 882.00	Prepare for and attend conference call regarding en banc review.
11/13/2016	Tiffany L. Amlot	3.70			3.70		\$ 2,479.00	Revise written discovery responses (3.2) and communications with client (0.5)
11/14/2016	Tiffany L. Amlot	1.30			1.30		\$ 871.00	Address discovery issues, including communications re: same.
11/14/2016	Tony K. Lu	2.10			2.10		\$ 714.00	Review and proofread response to request for production and generate list of additional documents required from client (1.1); Start review and bates label of Susan Thayer personnel file folder (1).
11/15/2016	Tony K. Lu	0.70			0.70		\$ 238.00	Continue review and bates-labeling of initial document production related to Thayer personnel file (.7).
11/15/2016	Tiffany L. Amlot	2.10			2.10		\$ 1,407.00	Communications with client (0.5); compile list of documents to be collected (1.6).
11/16/2016	Tiffany L. Amlot	3.40			3.40		\$ 2,278.00	Calls with clients (0.4); revise draft discovery responses an serve same (3.0).

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Date	Name / Invoice Number	Hours	Plds, Mtn, Brief	Research	Investigation	Interviewing	Amount	Description
11/16/2016	Alan S. Gilbert	0.20			0.20		\$ 192.00	Conference T. Amlot re: producing PPFA medical guidelines
11/18/2016	Tony K. Lu	1.00			1.00		\$ 340.00	Continue review and bates label of personnel file for production (1)
11/18/2016	Tiffany L. Amlot	0.50			0.50		\$ 335.00	Review and respond to correspondence re: document production.
11/28/2016	Tiffany L. Amlot	1.60			1.60		\$ 1,072.00	Negotiate joint agenda with opposing counsel (0.5); produce first set of documents (0.6); numerous follow-up communications with opposing counsel re: discovery issues, etc. (0.5)
11/29/2016	Tiffany L. Amlot	0.30			0.30		\$ 201.00	Initial review of plaintiff's discovery demands.
11/30/2016	Tiffany L. Amlot	1.20			1.20		\$ 804.00	Prepare for and attend court stat re: discovery (1.0); follow-up to same (0.2).
12/1/2016	Tony K. Lu	0.90			0.90		\$ 306.00	Conduct initial review and analysis of discovery deficiency letter from plaintiffs in response to PPH discovery response (.9).
12/5/2016	Tony K. Lu	2.90		0.50	2.40		\$ 986.00	Review and analyze additional documents for production, bates label and organize re: same and write internal email to T. Amlot re: same (2.4); Conduct additional legal research on issue related to standing orders and liability on FCA claims (.5).
12/7/2016	Tony K. Lu	3.30		3.30			\$ 1,122.00	Start legal research on issue related to regulatory non compliance issue and whether it is sufficient grounds for summary judgment in False Claims Act case (3.3)
12/8/2016	Tony K. Lu	3.50		3.50			\$ 1,190.00	Continue legal research for potential partial summary judgment on issue of breach of standing order based upon holding in Supreme Court case Escobar related to implied certification theory (3.5)
12/12/2016	Tiffany L. Amlot	0.30					\$ 201.00	Review proposed "court agenda" and communications w/opposing counsel re: same.
12/12/2016	Tony K. Lu	2.20			2.20		\$ 748.00	Continue review and analysis of discovery letter by Russ Hixson concerning First Request for Production of documents (1); Teleconference with Tiffany Amlot re: production (.5); Review and re-bates label PPH 0336-0550 and produce re: same (.7).
12/13/2016	Tiffany L. Amlot	3.90			3.90		\$ 2,613.00	Participate in court conference and follow up call w/local counsel (2.4); telephone conference w/clients (1.0); conferences w/R. Sangiacomo re: discovery, etc. (0.5)
12/13/2016	Tony K. Lu	0.50			0.50		\$ 170.00	Meet and confer with Tiffany Amlot and Roseanne Sangiacomo re: strategy on response to discovery matters (.5)
12/13/2016	Rosanne M. Sangiacomo	1.80			1.80		\$ 756.00	Meet with T. Amlot to discuss case background and action items (0.3); phone call with T. Amlot and client (1.0) telephone call with T. Amlot and T. Lu regarding case status and discovery issues. (0.5)
12/14/2016	Rosanne M. Sangiacomo	1.40			1.40		\$ 588.00	E-mails to and from client (0.5); set-up secure file-transfer platform (0.3); review discovery requests and responses (.6).
12/14/2016	Tony K. Lu	2.50			2.40		\$ 850.00	Telephone message to client (.1); Start review discovery letter and draft response to Plaintiffs' deficiency letter re: same (2.4)
12/15/2016	Rosanne M. Sangiacomo	1.40			0.30		\$ 588.00	Review and analyze District Court's Order and Opinion on Motion to Dismiss for familiarity with case background and issues (1.1); meet with T. Amlot to discuss data received from client and next steps for same (0.3)
12/15/2016	Tiffany L. Amlot	1.20			1.20		\$ 804.00	Draft further communications re: discovery disputes.
12/15/2016	Tony K. Lu	0.50			0.50		\$ 170.00	Continue draft and revision of discovery response letter (.5)
12/19/2016	Tiffany L. Amlot	0.80			0.80		\$ 536.00	Revise discovery letter re: objections and agreement.
12/20/2016	Tiffany L. Amlot	2.40			2.40		\$ 1,608.00	Draft correspondence to opposing counsel re: discovery, including analysis of issues as to same.
12/20/2016	Rosanne M. Sangiacomo	1.80			1.80		\$ 756.00	Analyze data pulled by client regarding abortion-related services and payments made by Medicaid in order to prepare for production.
12/20/2016	Tony K. Lu	0.50			0.50		\$ 170.00	PPH: review and bates label additional production and update spreadsheet re: same(.5)
12/21/2016	Rosanne M. Sangiacomo	1.20			1.20		\$ 504.00	Continue reviewing and analyzing data pulled by client re: abortion-related services and payments made by Medicaid in order to prepare for production (0.5); e-mails to and from client (0.5); phone call with client (0.2).
12/21/2016	Tiffany L. Amlot	0.40			0.40		\$ 268.00	Communications re: discovery and productions.

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12/21/2016	Tony K. Lu	0.20			0.20		\$ 68.00	Continue preparation of bates-labeled documents and coordinate service of the same (.2)
12/22/2016	Tony K. Lu	0.30			0.20		\$ 102.00	Teleconference with Roseanne Sangiacomo re: discovery production (.2)
12/22/2016	Tiffany L. Amlot	1.80			1.80		\$ 1,206.00	Analyze database production and conferences re: same (1.3); edit production letters (0.5).
12/22/2016	Rosanne M. Sangiacomo	2.50			2.50		\$ 1,050.00	Telephone conference with T. Amlot regarding call with client and production of billing data (0.5); prepare spreadsheets of billing data for production and draft cover letter to R. Hixson re: same (1.5); confer with T. Lu regarding finalizing production and uploading to opposing counsel secure site (0.5).
12/27/2016	Tony K. Lu	1.10			1.10		\$ 374.00	Telephone with Darren Alexander (1.1).
12/27/2016	Tiffany L. Amlot	0.30			0.30		\$ 201.00	Communications re: email search and production.
12/27/2016	Rosanne M. Sangiacomo	2.10	2.10				\$ 882.00	Review and analyze discovery requests and parties' meet and confer letters and begin researching and preparing Motion for Protective Order.
12/28/2016	Rosanne M. Sangiacomo	3.20	3.20				\$ 1,344.00	Research and analyze legal standards for protective motion in 8th Circuit and 8th Circuit/Iowa law re: protection of confidential information (2.0); draft motion for protective order (1.2).
12/28/2016	Tony K. Lu	1.40			1.40		\$ 476.00	Attention to PPH file upload to Relativity for review and production (.1); Attention to PPH and additional email requests (.6); Telephone with client (.5); Start review of Sue Thayer emails for privilege prior to production (1.2)
12/29/2016	Rosanne M. Sangiacomo	2.40	2.40				\$ 1,008.00	Prepare motion for protective order.
12/30/2016	Tiffany L. Amlot	0.30			0.30		\$ 201.00	Review correspondence from opposing counsel re: discovery and communications re: same.
12/30/2016	Tony K. Lu	0.30			0.30		\$ 102.00	Review discovery correspondence from Russ Hixson and write internal email update to T. Amlot re: discovery matters (.3)
1/3/2017	Kristen C. Rodriguez	2.00	0.50		1.50		\$ 1,330.00	Meeting with A. Gilbert and T. Amlot regarding analysis of discovery strategy (1.5) and summary judgment motion (.5).
1/3/2017	Tiffany L. Amlot	2.30	0.50		1.50		\$ 1,621.50	Conference w/team re: status and strategy (2); communications re: same (.3).
1/3/2017	Alan S. Gilbert	2.00	0.50		1.50		\$ 1,990.00	Conference with T. Amlot and K. Rodriguez re: strategy on discovery and summary judgment.
1/3/2017	Tony K. Lu	0.90			0.90		\$ 319.50	Continue review of emails for Planned Parenthood Sue Thayer Account prior to production.
1/4/2017	Alan S. Gilbert	0.20	0.20				\$ 199.00	Conference T. Amlot re: strategy on summary judgment and protective order (.2).
1/4/2017	Tiffany L. Amlot	0.30			0.30		\$ 211.50	Communications with opposing counsel re: meet and confer (.2); team communications re: same (.1).
1/5/2017	Kristen C. Rodriguez	1.20			1.20		\$ 798.00	Attend meet and confer with plaintiff's counsel.
1/5/2017	Tiffany L. Amlot	1.60			1.60		\$ 1,128.00	Prepare (.4) and engage in meet and confer (1.2).
1/6/2017	Rosanne M. Sangiacomo	0.20	0.20				\$ 84.00	Conference with T. Amlot regarding strategy for discovery motion practice.
1/6/2017	Tiffany L. Amlot	0.50	0.50				\$ 352.50	Conference with team re: discovery status (.2), motion for protective order, etc (.3).
1/8/2017	Rosanne M. Sangiacomo	2.10	2.10				\$ 882.00	Draft motion for partial stay of discovery pending narrowing of issues on summary judgment.
1/9/2017	Rosanne M. Sangiacomo	1.50	1.50				\$ 630.00	Continue draft motion for partial stay of discovery pending narrowing of issues on summary judgment (1.3); e-mails to and from T. Amlot regarding same (.2).
1/9/2017	Tony K. Lu	0.50			0.50		\$ 177.50	Continue review of emails related to Sue Thayer for production.
1/10/2017	Rosanne M. Sangiacomo	0.50			0.50		\$ 210.00	Telephone call with T. Amlot to discuss strategy for filing motion for partial stay of discovery (.1); review plaintiff's motion to compel (.4).
1/10/2017	Tiffany L. Amlot	3.80	3.80				\$ 2,679.00	Revise draft motion for protective order (3.6); communications re: same (.2).
1/10/2017	Ryan Aldrich	0.40					\$ 124.00	Correspondence regarding the preparation of client e-mail for attorney review prior to production to opposing counsel.
1/11/2017	Alan S. Gilbert	0.10					\$ 99.50	Conference T. Amlot re: discovery issues.
1/11/2017	Ryan Aldrich	0.80					\$ 248.00	Coordinate the processing of client e-mail for T. Lu's review. Create review workspace in preparation for upcoming document review, per T. Lu's request.
1/12/2017	Ryan Aldrich	0.40					\$ 124.00	Audit and analyze vendor processed client e-mail prior to T. Lu's request.

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1/12/2017	Rosanne M. Sangiacomo	0.90	0.90				\$ 378.00	Review and analyze motion to compel with attention to discovery issues.
1/12/2017	Alan S. Gilbert	0.30					\$ 298.50	Conference T. Amlot re: discovery issues
1/13/2017	Ryan Aldrich	0.30					\$ 93.00	Correspondence with T. Lu regarding upcoming document production.
1/13/2017	Rosanne M. Sangiacomo	2.40	2.40				\$ 1,008.00	Meet with A. Gilbert, T. Amlot and T. Lu to discuss Thayer's motion to compel and strategy for addressing and responding to same (2); e-mails with T. Amlot and T. Lu regarding motion to compel response strategy (.4).
1/13/2017	Tiffany L. Amlot	5.10	4.70		0.40		\$ 3,595.50	Continue analysis of motion to compel (.8); meet with team re same (2); numerous communications re email production (.4); begin drafting response to motion to compel (1.9).
1/13/2017	Alan S. Gilbert	2.00					\$ 1,990.00	Review plaintiff's motion to compel and conference Dentons lawyers re: response to same
1/13/2017	Tony K. Lu	3.20	2.30		0.90		\$ 1,136.00	Participate in teleconference with defense team concerning response to motion to compel (2); Review and analyze motion to compel (.3); Draft email to Mike Falkstrom (.2); Review and redact select emails from Sue Thayer Emails (.7)
1/14/2017	Rosanne M. Sangiacomo	0.50		0.50			\$ 210.00	Research and analyze standards for discovery relevance and proportionality under Federal Rule 26.
1/14/2017	Tony K. Lu	0.30			0.30		\$ 106.50	Review and spot check Sue Thayer emails for production.
1/15/2017	Rosanne M. Sangiacomo	3.10	2.50	0.60			\$ 1,302.00	Research and analyze discovery standards under federal rules (.6) and draft legal standard and argument section for response to motion to compel (2.5).
1/17/2017	Rosanne M. Sangiacomo	4.30	3.50	0.80			\$ 1,806.00	Research and analyze federal discovery standards (.8); draft response to motion to compel (2.5); confer with T. Amlot re: strategy for response brief (.3); review key file materials for same (.5); emails to and from J. Warren-Ulrick (.2),
1/17/2017	Tiffany L. Amlot	0.50			0.50		\$ 352.50	Conference with A. Gilbert re: strategy (.3); respond to correspondence re: discovery (.1); respond to correspondence re: upcoming hearing (.1).
1/17/2017	Tony K. Lu	0.80			0.80		\$ 284.00	Telephone and email communication with Darren Alexander (.5); Continue review and spot check Sue Thayer emails for production (.3)
1/17/2017	Alan S. Gilbert	0.30					\$ 298.50	Conference T. Amlot re: strategy
1/18/2017	Rosanne M. Sangiacomo	9.30	7.30	2.00			\$ 3,906.00	Research and analyze burden, proportionality and relevance discovery issues under 8th Circuit federal law (2); draft response brief (4.5); phone calls with J. Warren-Ulrick (.6); draft affidavit (1.6); phone call with S. Pearl (.3); confer with T. Amlot re: strategy (.3).
1/18/2017	Tiffany L. Amlot	5.40			5.40		\$ 3,807.00	Numerous telephone conversations re: affidavits re: burden of discovery (2.2); teleconference with client (2); numerous communications re: status of ongoing production efforts (.3); communications with opposing counsel re: email production (.1); revise draft affidavits (.8).
1/18/2017	Tony K. Lu	0.40			0.40		\$ 142.00	Teleconference with Tiffany Amlot and Rosanne S. re: discovery updates (.4)
1/19/2017	Rosanne M. Sangiacomo	4.30	3.20		1.10		\$ 1,806.00	Draft response to motion to compel and affidavit in support of same (3); phone call with S. Pearl (.4); analyze employee data from S. Pearl (.7); confer with T. Amlot re: strategy for brief (.2).
1/19/2017	Tiffany L. Amlot	8.10	7.00		1.10		\$ 5,710.50	Draft response to motion to compel (6.5) and associated communications (.5); communications re other outstanding discovery issues (1.1).
1/19/2017	Tony K. Lu	1.10			1.10		\$ 390.50	Review memorandum prepared by S. Petrek to identify additional individuals and revise email to Mike Falkstrom (.9); Teleconference with R. Sangiacomo re: Samplan (.1); Teleconference with Darren Alexander re: same (.1)
1/19/2017	Alan S. Gilbert	0.50					\$ 497.50	Conference T. Amlot re: discovery issues and general strategy
1/20/2017	Ryan Aldrich	0.40					\$ 124.00	Correspondence with T. Lu and T. Amlot regarding technical specifications for production to opposing counsel.
1/20/2017	Kristen C. Rodriguez	1.80	1.80				\$ 1,197.00	Revise and finalize response to motion to compel.

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1/20/2017	Rosanne M. Sangiacomo	6.80	6.80				\$ 2,856.00	Revise response to motion to compel and J. Warren-Ulrick affidavit (4.8); prepare exhibits (1); finalize brief for filing (.6); confer with T. Amlot re: revisions to affidavit (.1); phone calls with J. Warren-Ulrick re: affidavit (.3).
1/20/2017	Tiffany L. Amlot	11.10	11.10				\$ 7,825.50	Draft (6), revise (4), and finalize response to motion to compel (1.1).
1/20/2017	Tony K. Lu	3.30	3.00		0.30		\$ 1,171.50	Review Third Amended Complaint to assist in revision of response to motion to dismiss and assist in revising draft of the same (3); Attention to and internal email communications re: production of emails (.3)
1/20/2017	Alan S. Gilbert	2.00					\$ 1,990.00	Review and edit draft response to motion to compel and conferences T. Amlot re: same
1/22/2017	Rosanne M. Sangiacomo	0.30	0.30				\$ 126.00	Review briefing on motion to compel and prepare for trip to Iowa for argument on same.
1/23/2017	Rosanne M. Sangiacomo	9.00	7.00		2.00		\$ 3,780.00	Travel to Des Moines Iowa for client meetings and oral argument on Plaintiff's motion to compel (3); meet with M. Falkstrom, J. Warren, L. Racey, and S. Pearl and PPH offices (4); conference with T. Amlot on discovery issues and case strategy (2).
1/23/2017	Ryan Aldrich	2.10					\$ 651.00	Prepare documents for production and coordinate transfer of production media to opposing counsel, per T. Lu's request.
1/23/2017	Tiffany L. Amlot	11.60	10.60		1.00		\$ 8,178.00	Travel to Iowa (3); meet w/client (4); prepare for hearing (3.6); address email discovery issues (1).
1/23/2017	Tony K. Lu	1.00			1.00		\$ 355.00	Telephone and email communication with Ryan Aldrich re: document production and review of the same (1)
1/24/2017	Rosanne M. Sangiacomo	7.00	7.00				\$ 2,940.00	Attend hearing with Magistrate Judge on plaintiff's motion to compel (4); travel from Des Moines to Chicago (3).
1/24/2017	Tiffany L. Amlot	8.10	8.10				\$ 5,710.50	Prepare for hearing and attend same (4.5); travel back from Iowa (3); follow up from hearing (.6).
1/25/2017	Tiffany L. Amlot	1.70	1.40				\$ 1,198.50	Review court order (.4); prepare to do list; numerous communications with team members re: next steps, etc. (1).
1/25/2017	Tony K. Lu	0.10	0.10				\$ 35.50	Review order from judge re: motion to compel.
1/26/2017	Tony K. Lu	1.70			1.70		\$ 603.50	Teleconference with Darren Alexander (1.7).
1/27/2017	Rosanne M. Sangiacomo	2.50			2.40		\$ 1,050.00	Review magistrate judge order (.3); confer with T. Lu regarding discovery issues (1); review and type up notes from meetings with Planned Parenthood on 1/23 and circulate to team (.1); follow-up e-mails to numerous Planned Parenthood employees (1.1)
1/27/2017	Ryan Aldrich	0.40					\$ 124.00	Coordinate the processing of additional client e-mail for T. Lu's review.
1/27/2017	Tony K. Lu	0.70			0.70		\$ 248.50	Attention to various PPH Email collection and write internal email communications re: same 0.7.
1/30/2017	Tony K. Lu	1.00			1.00		\$ 355.00	Conduct spot check of emails in connection with 'Standing Order' search (1).
1/31/2017	Alan S. Gilbert	0.30					\$ 298.50	Conference T. Amlot re: hearing before Judge Bremer
1/31/2017	Tony K. Lu	0.90			0.90		\$ 319.50	Review documents uploaded to Relativity concerning standing order and billing services (.9).
1/31/2017	Ryan Aldrich	0.50					\$ 155.00	Audit and analyze processed client data in a searchable database prior to T. Lu's review.
2/1/2017	Rosanne M. Sangiacomo	2.10			2.10		\$ 882.00	Review and analyze Magistrate Judge Order (0.1); create to-do list for discovery (0.2); send follow up e-mails to client (0.1); conference call with D. Alexander, D. Larson and T. Lu to discuss billing records data searches for OCP claims (1.7).
2/1/2017	Tony K. Lu	1.70			1.70		\$ 603.50	Teleconference with Darren Alexander, Rosanne Sangiacomo.
2/2/2017	Rosanne M. Sangiacomo	0.30			0.30		\$ 126.00	Attention to discovery issues.
2/2/2017	Ryan Aldrich	0.40					\$ 124.00	Correspondence with T. Lu regarding additional client data coming for processing prior to attorney review.
2/2/2017	Tony K. Lu	1.40			1.40		\$ 497.00	Attention to email uploads from collection by Planned Parenthood and email communications with Darren Alexander and Ryan Aldrich.
2/3/2017	Rosanne M. Sangiacomo	0.30			0.30		\$ 126.00	Attention to discovery issues regarding OCP billing data.
2/3/2017	Tony K. Lu	0.20			0.20		\$ 71.00	Teleconference with Darren Alexander re: discovery upload (.2)

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2/6/2017	Rosanne M. Sangiacomo	1.20			1.20		\$ 504.00	Review and analyze discovery correspondence from R. Hixson (.2); review billing data spreadsheets re: OCP prescriptions from D. Larson (1).
2/6/2017	Tony K. Lu	0.40			0.40		\$ 142.00	Attention to files provided by Darren Alexander re: discovery requests (.3); Review correspondence from opposing counsel re: discovery compliance (.1)
2/7/2017	Rosanne M. Sangiacomo	0.20			0.20		\$ 84.00	Review correspondence from M. Falkstrom.
2/7/2017	Tiffany L. Amlot	1.40			1.40		\$ 987.00	Numerous communications re: discovery, etc.
2/10/2017	Ryan Aldrich	1.00					\$ 310.00	Prepare data and coordinate the processing of additional abortion related billing and standing order e-mail for attorney review, per T. Lu's request. .5 Prepare and coordinate the processing of client data on thumb drive for attorney review, per T. Amlot's request. .5
2/13/2017	Ryan Aldrich	0.60					\$ 186.00	Audit and analyze client data prior to attorney review.
2/13/2017	Rosanne M. Sangiacomo	1.20			1.20		\$ 504.00	Analyze OCP billing data (.7); begin reviewing personnel files (.5).
2/14/2017	Rosanne M. Sangiacomo	4.80			4.80		\$ 2,016.00	Review personnel files (4) and prepare for first rolling production next week (.8).
2/14/2017	Ryan Aldrich	0.40					\$ 124.00	Correspondence with R. Sangiacomo regarding the review of client personnel files prior to production to opposing counsel.
2/15/2017	Rosanne M. Sangiacomo	5.30			5.30		\$ 2,226.00	Review personnel files (4) and prepare for first rolling production next week (1.3).
2/15/2017	Ryan Aldrich	0.30					\$ 93.00	Correspondence with case team regarding processed client data to be reviewed prior to production.
2/16/2017	Rosanne M. Sangiacomo	0.90			0.90		\$ 378.00	Review personnel files (.8)and prepare for first rolling production next week (.1).
2/16/2017	Tony K. Lu	1.40			1.40		\$ 497.00	Review Relativity documents for relevance and production related to standing order emails.
2/17/2017	Rosanne M. Sangiacomo	5.70			5.70		\$ 2,394.00	Phone call with J. Warren-Ulrick (1); conference with T. Amlot re: strategy for birth control billing data production and response to R. Hixson discovery letter (1); prepare birth control data spreadsheet production and draft cover letter for same (3); continue reviewing and preparing personnel files for production; conference with P. Mitchell (.7).
2/17/2017	Tiffany L. Amlot	2.40			2.40		\$ 1,692.00	Address issues re: discovery, database production, etc.
2/17/2017	Tony K. Lu	6.80			6.80		\$ 2,414.00	Continue review of PPH Standing order emails for relevance and further review.
2/20/2017	Rosanne M. Sangiacomo	0.20			0.20		\$ 84.00	Conference with T. Amlot regarding outstanding discovery items and personnel file production.
2/21/2017	Rosanne M. Sangiacomo	4.60			4.60		\$ 1,932.00	Review and prepare first batch of personnel files for production tomorrow (4); multiple conferences with T. Amlot and R. Aldrich regarding finalizing production (.4); meet with S. Smith regarding her continuing review of personnel files (.2).
2/21/2017	Suzanne D. Smith	3.20					\$ 1,008.00	Meet with R. Sangiacomo to discuss review guidelines (.8); Begin review of custodian files (2.4).
2/21/2017	Tiffany L. Amlot	1.20			1.20		\$ 846.00	Meet with team re: discovery, etc.
2/21/2017	Ryan Aldrich	2.10					\$ 651.00	Preform searches to isolate documents for R. Sangiacomo's review. .4 Prepare documents for production, per R. Sangiacomo's request. 1.4 Correspondence with case team regarding client documents requiring further processing prior to review. .3
2/21/2017	Tony K. Lu	0.60			0.60		\$ 213.00	Continue review and analysis of identified documents in Relativity and start draft of memo re: same.
2/22/2017	Rosanne M. Sangiacomo	0.20			0.20		\$ 84.00	E-mails to and from T. Amlot regarding production of personnel files (.1); review production letter (.1).
2/22/2017	Ryan Aldrich	0.30					\$ 93.00	Correspondence with T. Amlot regarding document production to be transferred to opposing counsel.
2/22/2017	Suzanne D. Smith	4.40					\$ 1,386.00	Review custodian files for production (2.2); tag accordingly (2.2).
2/22/2017	Tiffany L. Amlot	3.70			3.70		\$ 2,608.50	Review and prepare production of personnel files.
2/22/2017	Tony K. Lu	2.20			2.20		\$ 781.00	Continue review of documents obtained from Darren Alexander and draft memo to Tiffany Amlot re: summary of documents related to standing orders.

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Date	Name / Invoice Number	Hours	Plds, Mtn, Brief	Research	Investigation	Interviewing	Amount	Description
2/23/2017	Suzanne D. Smith	1.30					\$ 409.50	Review custodian files for production (1); tag accordingly (.3).
2/23/2017	Tiffany L. Amlot	3.20			3.20		\$ 2,256.00	Continue drafting summary judgment submission (2.5); communications re: same (.5); revise and serve same (.2).
2/23/2017	Tony K. Lu	3.80			3.80		\$ 1,349.00	Review discovery correspondence PPH re: production (.1); Review and identify SANE standing order emails for further evaluation (1.1); Review third amended complaint and draft discovery requests (1.7); Start review of abortion billing emails in Relativity (.9)
2/23/2017	Ryan Aldrich	0.40					\$ 124.00	Prepare production documents and FedEx to opposing counsel, per T. Amlot's request.
2/23/2017	Alan S. Gilbert	1.30					\$ 1,293.50	Review and edit draft letter to plaintiff's counsel regarding summary judgment and discovery and conferences with T. Amlot regarding same.
2/24/2017	Tony K. Lu	0.20			0.20		\$ 71.00	Review letter to counsel re: summary judgment issues (.1); Write internal email to T. Amlot concerning other Standing orders (.1)
2/27/2017	Suzanne D. Smith	3.20					\$ 1,008.00	Review custodian files on Relativity for production (2.1); Tag accordingly (1.1).
2/27/2017	Tiffany L. Amlot	0.50			0.50		\$ 352.50	Correspondence re: government production.
2/27/2017	Ryan Aldrich	0.30					\$ 93.00	Perform searches to isolate potentially responsive documents for T. Lu's review.
2/27/2017	Tony K. Lu	0.20			0.20		\$ 71.00	Coordinate with litigation support manager.
2/28/2017	Ryan Aldrich	0.30					\$ 93.00	Perform searches to isolate documents and perform bulk designations, per S. Smith's request.
2/28/2017	Rosanne M. Sangiacomo	0.20			0.20		\$ 84.00	Review correspondence from R. Hixson regarding discovery issues.
2/28/2017	Suzanne D. Smith	3.20					\$ 1,008.00	Review custodian files in Relativity for production (2.2); Tag accordingly (1).
2/28/2017	Tiffany L. Amlot	2.70			2.70		\$ 1,903.50	Analyze plaintiff submissions (2); draft joint agenda (.4); call with opposing counsel communications with team (.3).
2/28/2017	Alan S. Gilbert	0.50					\$ 497.50	Review plaintiff's requested discovery and emails re: same
2/28/2017	Tony K. Lu	2.20			2.20		\$ 781.00	Start review of culled documents re: communications about abortion-related services.
3/1/2017	Rosanne M. Sangiacomo	0.20			0.20		\$ 84.00	E-mails with T. Amlot regarding tomorrow's telephonic status hearing with Magistrate Judge.
3/1/2017	Tiffany L. Amlot	1.10			1.10		\$ 775.50	Prepare for hearing, including communications re: same.
3/1/2017	Tony K. Lu	2.60			2.60		\$ 923.00	Continue review of emails related to abortion-billing services in Relativity.
3/2/2017	Rosanne M. Sangiacomo	1.30			1.30		\$ 546.00	Prepare for and participate in telephonic status conference with Magistrate Judge Bremer (1); conference with T. Amlot regarding discovery open items and strategy (.3).
3/2/2017	Tiffany L. Amlot	1.70			1.70		\$ 1,198.50	Participate in court conference (1) and follow-up meetings (.7).
3/2/2017	Tony K. Lu	0.20			0.20		\$ 71.00	Review correspondence from Russ Hixson on discovery compliance.
3/2/2017	Tony K. Lu	5.00			5.00		\$ 1,775.00	Continue review of emails (2) and documents (3) related to abortion billing services for discovery production.
3/3/2017	Tony K. Lu	7.20			7.20		\$ 2,556.00	Continue review (4) and tagging of relevant documents concerning abortion-related billing services for production (3.2).
3/3/2017	Alan S. Gilbert	0.50					\$ 497.50	Conference T. Amlot re: status hearing and strategy
3/4/2017	Suzanne D. Smith	2.40					\$ 756.00	Review custodian files for production (2); tag accordingly (.4).
3/6/2017	Ryan Aldrich	1.40					\$ 434.00	Prepare documents for production and transfer to opposing counsel, per R. Sangiacomo's request.
3/6/2017	Rosanne M. Sangiacomo	3.20			3.20		\$ 1,344.00	Review personnel file documents flagged by S. Smith (1.4); confer with S. Smith regarding second production of personnel files (.2); finalize and prepare second production (1.4); confer with R. Aldrich re: same; prepare cover letter for second personnel file production (.2).
3/6/2017	Suzanne D. Smith	2.10					\$ 661.50	Create index of production documents (.7); Continue custodian review (1); tag for production (.4).
3/6/2017	Tiffany L. Amlot	0.70			0.70		\$ 493.50	Oversee production of additional personnel files, including numerous team communications and revisions to production letter.
3/6/2017	Tony K. Lu	2.00			2.00		\$ 710.00	Conduct quality control review of standing order (1) and abortion-related services emails for production purposes (1).

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Date	Name / Invoice Number	Hours	Plds, Mtn, Brief	Research	Investigation	Interviewing	Amount	Description
3/7/2017	Rosanne M. Sangiacomo	0.20			0.20		\$ 84.00	E-mails with S. Smith regarding personnel file review.
3/7/2017	Suzanne D. Smith	3.10					\$ 976.50	Finalize review of all custodians (1.6); tag for production (1.5).
3/7/2017	Tony K. Lu	0.50			0.50		\$ 177.50	Review discovery correspondence for Planned Parenthood (.1); Continue quality control of email review and internal email to discovery manager re: same (.4)
3/8/2017	Rosanne M. Sangiacomo	0.20			0.20		\$ 84.00	Attention to discovery issues.
3/9/2017	Kristen C. Rodriguez	1.10			1.10		\$ 731.50	Attend strategy meeting with team.
3/9/2017	Ryan Aldrich	0.70					\$ 217.00	Perform searches to isolate documents for T. Lu's review prior to upcoming production. Coordinate the preparation of client documents prior to upcoming production, per R. Sangiacomo's request.
3/9/2017	Rosanne M. Sangiacomo	1.40	1.00		0.40		\$ 588.00	Meet with T. Amlot, K. Rodriguez and T. Lu to discuss discovery strategy and motions for summary judgment (1); attention to discovery issues (.4).
3/9/2017	Tiffany L. Amlot	3.60	3.60				\$ 2,538.00	Review government records re: audits (2) and evaluate summary judgment defenses (1); communications with team re: same (.6).
3/9/2017	Tony K. Lu	1.60	1.10		0.50		\$ 568.00	Participate in teleconference with Tiffany Amlot, Kristen Rodriguez, and Rosanne Sangiacomo re: summary judgment (1.1); Teleconference with Darren Alexander(.1); Review Relativity emails pursuant to additional search (.4)
3/10/2017	Rosanne M. Sangiacomo	0.80	0.60		0.20		\$ 336.00	Attention to discovery issues (.2); research False Claims Act defenses in preparation for drafting summary judgment motions (.6).
3/13/2017	Rosanne M. Sangiacomo	0.80			0.80		\$ 336.00	Review third set of personnel files reviewed by S. Smith in order to prepare for production.
3/14/2017	Rosanne M. Sangiacomo	1.50		0.80	0.70		\$ 630.00	Review third set of personnel files reviewed by S. Smith in order to prepare for production (.5); research false claims act defenses, especially public disclosure defense/bar (.8); conference with S. Smith regarding personnel file issues (.2).
3/15/2017	Rosanne M. Sangiacomo	2.60		1.40	1.20		\$ 1,092.00	Conference with S. Smith regarding personnel file issues (.2); prepare letter to R. Hixson regarding specific personnel file documents (1); continue researching False Claims act defenses in preparation for summary judgment motion (1.4).
3/15/2017	Suzanne D. Smith	3.60					\$ 1,134.00	Telephone call with R. Sangiacomo to discuss additional document review (.6); review/tag documents for responsiveness (3).
3/15/2017	Tony K. Lu	0.40			0.40		\$ 142.00	Review Relativity for response emails and write email to Darren Alexander.
3/16/2017	Rosanne M. Sangiacomo	4.10	0.80	0.60	2.70		\$ 1,722.00	Review third personnel file production and draft instructions for litigation support for production (2.2); quality check production and prepare cover letter for same (.5); continue researching False Claims act defenses in preparation for summary judgment motion (.6); weekly strategy meeting with T. Amlot, K. Rodriguez and T. Lu to discuss discovery issues and summary judgment (.8)
3/16/2017	Suzanne D. Smith	1.20					\$ 378.00	Update production index to be sent to opposing counsel.
3/16/2017	Suzanne D. Smith	3.90					\$ 1,228.50	Review additional documents for production (2); tag accordingly (1.9).
3/16/2017	Ryan Aldrich	1.60					\$ 496.00	Prepare documents for production to opposing counsel per R. Sangiacomo's request.
3/16/2017	Tiffany L. Amlot	2.30	0.80		1.50		\$ 1,621.50	Team meeting (.8); revise discovery letter, etc. (1.5).
3/16/2017	Tony K. Lu	2.20	0.80		1.40		\$ 781.00	Participate in weekly teleconference with Tiffany Amlot Kristen Rodriguez and Rosanne Sangiacomo re: discovery and summary judgment (.8); Perform quality control and review of abortion emails for production (1.4)
3/17/2017	Rosanne M. Sangiacomo	2.00		0.60	1.40		\$ 840.00	Finalize production cover letter and send out third production of claim files (.6); conference with S. Smith re: ongoing review (.2); attention to discovery issues (.6); research False Claims act defenses and summary judgment issues (.6).
3/17/2017	Tiffany L. Amlot	1.10			1.10		\$ 775.50	Communications with client, address discovery issues, etc.
3/17/2017	Tony K. Lu	0.10			0.10		\$ 35.50	Attention to redacted financial statement and relevant email for production and internal email re: same.

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Date	Name / Invoice Number	Hours	Plds, Mtn, Brief	Research	Investigation	Interviewing	Amount	Description
3/17/2017	Ryan Aldrich	0.40					\$ 124.00	Coordinate the transfer of production documents to opposing counsel per, R. Sangiacomo's request.
3/18/2017	Suzanne D. Smith	1.40					\$ 441.00	Review additional documents for production (.7); tag accordingly (.7).
3/20/2017	Rosanne M. Sangiacomo	1.80		1.80			\$ 756.00	Research legal issues for summary judgment.
3/20/2017	Suzanne D. Smith	2.90					\$ 913.50	Review additional custodian files (1.5); tag for production (1.4).
3/21/2017	Suzanne D. Smith	4.80					\$ 1,512.00	Review additional custodian files (2.4); tag for production (2.4).
3/22/2017	Suzanne D. Smith	4.10					\$ 1,291.50	Review additional custodian files (2.1); tag for production (2).
3/23/2017	Rosanne M. Sangiacomo	0.10			0.10		\$ 42.00	E-mails with S. Smith regarding personnel file document review.
3/23/2017	Suzanne D. Smith	0.30					\$ 94.50	Revise tagging of various custodian files.
3/23/2017	Patrick S. Kabat	0.80					\$ 348.00	Review latest FOIA request and develop litigation strategy.
3/24/2017	Tiffany L. Amlot	0.30			0.30		\$ 211.50	Communications re: state law claims, etc.
3/24/2017	Alan S. Gilbert	0.20					\$ 199.00	Review e-mail regarding dropping state law claims.
3/27/2017	Tiffany L. Amlot	0.90			0.90		\$ 634.50	Numerous communications re: rescheduling court status and associated filings.
3/27/2017	Patrick S. Kabat	0.60					\$ 261.00	Conduct call with FOIA officer.
3/29/2017	Rosanne M. Sangiacomo	0.80			0.80		\$ 336.00	Review documents tagged for further review from final personnel file batch reviewed by S. Smith in order to prepare for production.
3/30/2017	Rosanne M. Sangiacomo	0.20			0.20		\$ 84.00	Review discovery correspondence from R. Hixson regarding personnel files.
3/30/2017	Tiffany L. Amlot	1.20			1.20		\$ 846.00	Call w/client (1); review communications and issues re: status, discovery (.2).
3/30/2017	Tony K. Lu	0.10			0.10		\$ 35.50	Email followup to Darren Alexander re: search.
3/31/2017	Rosanne M. Sangiacomo	0.80			0.80		\$ 336.00	Review and finalize last production of personnel files and prepare instructions for litigation support for same.
3/31/2017	Tiffany L. Amlot	0.40					\$ 282.00	Numerous communications with team litigators re: potential litigation strategy and accounting concerns.
3/31/2017	Ryan Aldrich	2.20					\$ 682.00	Prepare documents for production to opposing counsel, per R. Sangiacomo's request.
4/3/2017	Rosanne M. Sangiacomo	1.20			1.20		\$ 504.00	Finalize production of personnel files (.6); prepare cover letter and incorporate index prepared by S. Smith (.3); prepare summary sheet of employee files provided (.3).
4/3/2017	Ryan Aldrich	0.40					\$ 124.00	Coordinate the transfer of production documents to opposing counsel per R. Sangiacomo's request.
4/3/2017	Patrick S. Kabat	1.80					\$ 783.00	Prepare for and conduct negotiation with agency.
4/3/2017	Tiffany L. Amlot	0.60			0.60		\$ 423.00	Communications re: ongoing discovery disputes, productions, etc.
4/4/2017	Rosanne M. Sangiacomo	0.20			0.20		\$ 84.00	Attention to discovery issues.
4/4/2017	Tiffany L. Amlot	0.50			0.50		\$ 352.50	Address discovery issues.
4/6/2017	Tiffany L. Amlot	0.30			0.30		\$ 211.50	Communications re: discovery.
4/6/2017	Patrick S. Kabat	2.20					\$ 957.00	Heartland negotiate release of records with counsel for ICE.
4/10/2017	Tiffany L. Amlot	0.60			0.60		\$ 423.00	Review and respond to proposed agenda; communications with client.
4/10/2017	Tony K. Lu	0.10			0.10		\$ 35.50	Email communication with Darren Alexander.
4/11/2017	Rosanne M. Sangiacomo	0.50			0.50		\$ 210.00	Review and analyze letter from R. Hixson regarding billing data on abortion claims (.3); conference with T. Amlot regarding same (.2).
4/11/2017	Tiffany L. Amlot	1.80			1.80		\$ 1,269.00	Call with client (1); call with opposing counsel (.4); address ongoing discovery productions (.4).
4/11/2017	Tony K. Lu	2.90			2.90		\$ 1,029.50	Attention to, review, and organize documents for production (1.8); Review prior correspondence on discovery and draft production letter (.9); Teleconference with Tiffany Amlot re: meeting minutes and communicate with opposing counsel re: production (.2)
4/11/2017	Ryan Aldrich	2.20					\$ 682.00	Prepare documents for production and transmit to opposing counsel, per T. Lu's request.
4/12/2017	Tiffany L. Amlot	0.70			0.70		\$ 493.50	Telephonic court conference and follow-up to same.
4/12/2017	Tony K. Lu	0.10	0.10				\$ 35.50	Review order of the court re: discovery following hearing.
4/13/2017	Rosanne M. Sangiacomo	0.60			0.60		\$ 252.00	Review discovery correspondence from R. Hixson regarding personnel files and investigate his questions regarding same (.3); prepare letter to R. Hixson regarding additional data fields not produced (.3).

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Date	Name / Invoice Number	Hours	Plds, Mtn, Brief	Research	Investigation	Interviewing	Amount	Description
4/14/2017	Rosanne M. Sangiacomo	3.20		2.00	1.20		\$ 1,344.00	Prepare letter to R. Hixson regarding additional data fields not produced (.6); research False Claims Act defenses in preparation for summary judgment (2); review documents produced to Thayer regarding standing order communications (.6)
4/16/2017	Tiffany L. Amlot	0.60			0.60		\$ 423.00	Address discovery issues.
4/17/2017	Rosanne M. Sangiacomo	2.20			2.20		\$ 924.00	Revise letter to R. Hixson regarding: database fields per T. Amlot's request (.2); analyze billing data for same (2).
4/18/2017	Rosanne M. Sangiacomo	3.40			3.40		\$ 1,428.00	Review correspondence from R. Hixson regarding additional personnel files (.6); review and analyze employee list spreadsheet and OCP billing data (1.2); e-mails to and from S. Pearl and T. Clark regarding gathering same (.4); revise letter regarding additional data fields per T. Amlot suggestion (.6); e-mails with R. Aldrich (.6).
4/18/2017	Tiffany L. Amlot	1.10			1.10		\$ 775.50	Address discovery issues.
4/19/2017	Rosanne M. Sangiacomo	3.40			3.40		\$ 1,428.00	Review and revise letter re: additional data columns (1); meet with T. Amlot to discuss outstanding discovery issues abortion-billing related data, and letter revisions (.5); call with T. Amlot and M. Falkstrom (.5); analyze abortion billing data (1.4).
4/19/2017	Ryan Aldrich	0.40					\$ 124.00	Coordinate the processing of additional personnel files for attorney review, per R. Sangiacomo's request.
4/19/2017	Tiffany L. Amlot	3.60			3.60		\$ 2,538.00	Address discovery issues.
4/20/2017	Rosanne M. Sangiacomo	3.40			3.40		\$ 1,428.00	Prepare e-mail to to J. Warren-Ulrich (1); conference with T. Amlot regarding same (.6); e-mails with R. Aldrich regarding loading and processing personnel file documents (.2); review personnel file documents (1.2); phone call and e-mails with D. Alexander regarding abortion billing data (.4).
4/20/2017	Tiffany L. Amlot	0.90			0.90		\$ 634.50	Address discovery issues.
4/21/2017	Rosanne M. Sangiacomo	0.90			0.90		\$ 378.00	Review and analyze abortion-related billing data (.6); telephone conference with D. Alexander and D. Larson at PPH (.3).
4/24/2017	Rosanne M. Sangiacomo	0.40			0.40		\$ 168.00	Attention to discovery issues; e-mails with PPH.
4/24/2017	Tiffany L. Amlot	3.70			3.70		\$ 2,608.50	Draft revised discovery responses.
4/25/2017	Rosanne M. Sangiacomo	3.10			3.10		\$ 1,302.00	Review and edit draft amended document responses (.5); analyze billing data in order to provide edits (.5); conference with T. Amlot regarding same (.2); e-mails with PPH (.3); confer with S. Smith regarding additional personnel file review (.5); conference with T. Amlot regarding database fields issue (.5); review interrogatory requests (.6).
4/25/2017	Patrick S. Kabat	2.20					\$ 957.00	Review FOIA production and strategize response with client.
4/25/2017	Tiffany L. Amlot	1.40			1.40		\$ 987.00	Address discovery issues and revised amended written responses.
4/25/2017	Tony K. Lu	0.90			0.90		\$ 319.50	Review and comment on draft response to request for production.
4/26/2017	Rosanne M. Sangiacomo	1.00			1.00		\$ 420.00	Review and analyze Thayer's interrogatory requests and prepare spreadsheet regarding bills at issue (.5); e-mails with PPH (.3); confer with S. Smith regarding additional personnel file review (.2).
4/27/2017	Tiffany L. Amlot	0.50			0.50		\$ 352.50	Address new discovery requests.
4/28/2017	Rosanne M. Sangiacomo	1.50			1.50		\$ 630.00	E-mails with PPH employees (.7); edit and finalize letter to R. Hixson regarding additional database information (.5); conference with T. Amlot regarding same and regarding interrogatory requests (.3).
4/28/2017	Tiffany L. Amlot	0.90			0.90		\$ 634.50	Address discovery issues.
4/28/2017	Ryan Aldrich	0.40					\$ 124.00	Prepare personnel files for attorney review, per S. Smith's request.
5/1/2017	Rosanne M. Sangiacomo	1.00			1.00		\$ 420.00	E-mails with J. Warren-Ulrich and M. Falkstrom (.5); review documents from personnel files and e-mails with S. Smith (.5).
5/1/2017	Suzanne D. Smith	2.10					\$ 661.50	Review custodian pdf files, retrieve responsive documents, convert and send to attorney for review.
5/1/2017	Tiffany L. Amlot	0.90	0.90				\$ 634.50	Analyze motion to compel.
5/2/2017	Alan S. Gilbert	1.00					\$ 995.00	Review plaintiff's second motion to compel and supporting brief and affidavit.
5/2/2017	Alan S. Gilbert	0.20					\$ 199.00	Review plaintiff's second set of interrogatories.

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Date	Name / Invoice Number	Hours	Plds, Mtn, Brief	Research	Investigation	Interviewing	Amount	Description
5/2/2017	Rosanne M. Sangiacomo	3.60					\$ 1,512.00	Analyze interrogatory requests and e-mail communications with client; review and analyze sample CMS claim form; research and investigate diagnosis code issue; review and analyze Thayer's motion to compel.
5/2/2017	Tiffany L. Amlot	1.90	1.00		0.90		\$ 1,339.50	Analyze motion to compel (1); address discovery (.9).
5/3/2017	Rosanne M. Sangiacomo	2.30	2.10		0.20		\$ 966.00	Review and analyze Motion to Compel (.9); meet with T. Amlot to discuss strategy for resistance to motion to compel (1.2), interrogatory requests and other discovery items (.2).
5/3/2017	Tiffany L. Amlot	4.90	4.90				\$ 3,454.50	Address motion to compel (3.5), including meetings (1.2), conference calls, etc. (.2).
5/3/2017	Alan S. Gilbert	1.00					\$ 995.00	Conference with T. Amlot regarding case status and strategy.
5/3/2017	Tony K. Lu	0.20	0.20				\$ 71.00	Teleconference with Tiffany Amlot re: audit search and motion to compel.
5/4/2017	Rosanne M. Sangiacomo	1.70	1.70				\$ 714.00	Draft resistance to motion to compel; (1) attention to discovery issues concerning billing records (.7).
5/5/2017	Rosanne M. Sangiacomo	4.80	2.60	2.20			\$ 2,016.00	Review and analyze Thayer's motion to compel (.6); research relevance and proportionality standards under Federal Rules (2.2); draft resistance to motion to compel (2).
5/6/2017	Rosanne M. Sangiacomo	4.00	4.00				\$ 1,680.00	Draft resistance to motion to compel.
5/7/2017	Rosanne M. Sangiacomo	5.10	5.10				\$ 2,142.00	Draft resistance to motion to compel.
5/8/2017	Rosanne M. Sangiacomo	5.10	5.10				\$ 2,142.00	Draft resistance to second motion to compel (2); review and analyze key discovery correspondence and productions for same (1); begin drafting declaration for D. Larson in support of same (1.1); confer with T. Amlot regarding strategy for same (1).
5/9/2017	Rosanne M. Sangiacomo	6.80	6.40		0.40		\$ 2,856.00	Draft resistance to second motion to compel (3); review and analyze key discovery correspondence and productions for same (1); begin drafting declaration for D. Larson in support of same (2); telephone call with D. Alexander and D. Larson (.4); attention to discovery issues (.4).
5/9/2017	Tony K. Lu	2.00			2.00		\$ 710.00	Start draft of responses to second set of interrogatories from plaintiff.
5/10/2017	Rosanne M. Sangiacomo	4.30	4.30				\$ 1,806.00	Draft resistance to second motion to compel (2); follow up e-mails with D. Larson and D. Alexander (.5); revise declaration of D. Larson and incorporate revisions into brief (1); conference with T. Amlot regarding brief revisions (.8)
5/10/2017	Tony K. Lu	1.90			1.90		\$ 674.50	Continue draft and revision of responses and objections to second set of interrogatories (1.8) ; Email communication to Darren Alexander re: followup (.1)
5/11/2017	Rosanne M. Sangiacomo	4.50	3.70		0.80		\$ 1,890.00	E-mails with T. Amlot and T. Lu regarding discovery issues and responses (.8); continue preparing resistance to motion to compel and incorporate feedback from T. Amlot for same (3); revise D. Larson declaration ISO resistance (.4); conference with T. Amlot regarding brief (.3).
5/11/2017	Tiffany L. Amlot	0.60	0.60				\$ 423.00	Work on motion to compel response, discovery responses, etc.
5/12/2017	Rosanne M. Sangiacomo	1.10	1.10				\$ 462.00	Prepare resistance to motion to compel and supporting declarations for D. Larson and J. Warren-Ulrick.
5/12/2017	Tiffany L. Amlot	2.60	2.60				\$ 1,833.00	Work on response to motion to compel, including declarations, etc.
5/13/2017	Tiffany L. Amlot	5.00	5.00				\$ 3,525.00	Work on response brief to motion to compel.
5/14/2017	Tiffany L. Amlot	8.30	8.30				\$ 5,851.50	Work on response brief to motion to compel.
5/14/2017	Tony K. Lu	0.90			0.90		\$ 319.50	Start draft of responses to second request for production of documents (.9)
5/15/2017	Kristen C. Rodriguez	0.50	0.50				\$ 355.00	Work on summary judgment brief.
5/15/2017	Alan S. Gilbert	1.50					\$ 1,492.50	Review and edit draft response to second motion to compel.
5/15/2017	Rosanne M. Sangiacomo	5.70	5.70				\$ 2,394.00	Review and cite check brief in resistance to motion to compel (3); incorporate edits from local counsel (1); confer with T. Amlot regarding same (.5); review and incorporate A. Gilbert edits (1); finalize declarations and exhibits and file brief (.2).
5/15/2017	Tiffany L. Amlot	1.10	1.10				\$ 775.50	Revise brief, etc.

Date	Name / Invoice Number	Hours	Plds, Mtn, Brief	Research	Investigation	Interviewing	Amount	Description
5/15/2017	Tony K. Lu	1.90			1.90		\$ 674.50	Continue draft and revision of discovery responses (1.1); Telephone with Rosanne Sangiacomo re: discovery requests (.4); Review notes and leave message for Jennifer Warren Ulrich (.4)
5/16/2017	Rosanne M. Sangiacomo	0.20	0.20				\$ 84.00	Prepare Pro Hac Vice motion.
5/16/2017	Tiffany L. Amlot	0.30			0.30		\$ 211.50	Address discovery, etc.
5/16/2017	Tony K. Lu	0.50	0.50				\$ 177.50	Review opposition to motion to compel (.2); Email communications with Jennifer Warren Ulrich (.3)
5/17/2017	Rosanne M. Sangiacomo	0.70			0.70		\$ 294.00	Telephone conference with T. Lu regarding responses to second document requests (.4); review second document responses (.3).
5/17/2017	Tiffany L. Amlot	0.60			0.60		\$ 423.00	Address discovery, etc.
5/17/2017	Tony K. Lu	2.40			2.40		\$ 852.00	Teleconference with Rosanne Sangiacomo re: discovery responses(.5); Conduct search of Relativity for relevant documents (1.3); revise draft of response to request for production (.6).
5/18/2017	Tony K. Lu	0.50			0.50		\$ 177.50	Revise draft of response to request for production (.5)
5/19/2017	Rosanne M. Sangiacomo	0.20			0.20		\$ 84.00	E-mails with T. Lu regarding discovery issues.
5/19/2017	Tiffany L. Amlot	1.60			1.60		\$ 1,128.00	Review and revise discovery responses, etc.
5/19/2017	Tony K. Lu	2.30			2.30		\$ 816.50	Telephone with Tiffany Amlot re: response to discovery requests (.4); Revise draft response to request for production and affirmative discovery (.7); Telephone with Dan Larson (.3); Prepare for and participate in telephone call with Jennifer Warren Ulrick (.9)
5/22/2017	Patrick S. Kabat	1.20					\$ 522.00	Review correspondence from C. Valenzuela and develop FOIA strategy.
5/22/2017	Tony K. Lu	0.70			0.70		\$ 248.50	Telephone with Darren Alexander.
5/23/2017	Rosanne M. Sangiacomo	4.20	4.20				\$ 1,764.00	Prepare for oral argument on motion to compel (2.2); review key documents concerning discovery issues and disputes (2).
5/24/2017	Kristen C. Rodriguez	3.70	3.70				\$ 2,627.00	Prepare for and attend telephonic court hearing.
5/24/2017	Rosanne M. Sangiacomo	8.20	8.20				\$ 3,444.00	Prepare for and argue motion to compel, including conferences with K. Rodriguez, T. Amlot, M. Falkstrom and S. Thompson (5.2); review key file documents concerning discovery disputes and prepare outline for same (3).
5/24/2017	Tony K. Lu	0.30			0.30		\$ 106.50	Attention to file downloads from Darren Alexander and Jennifer Warren Ulrich.
5/25/2017	Rosanne M. Sangiacomo	3.00	1.00		2.00		\$ 1,260.00	Prepare e-mail summary to M. Falkstrom (.5); telephone call with D. Alexander regarding same (.5); conference with T. Amlot regarding strategy for remaining discovery and summary judgment (1); review Iowa Medicaid documents; e-mails with litigation support regarding same (1).
5/25/2017	Tiffany L. Amlot	1.20			1.20		\$ 846.00	Address discovery, hearing, etc.
5/25/2017	Tony K. Lu	2.80			2.80		\$ 994.00	Review documents provided by Jennifer Warren Ulrick and continue draft and revision of response to interrogatories (2.5); Telephone with Rosanne Sangiacomo re: CMS 1500 forms.
5/26/2017	Rosanne M. Sangiacomo	1.60			1.60		\$ 672.00	Attention to discovery issues.
5/26/2017	Tiffany L. Amlot	1.20			1.20		\$ 846.00	Address discovery, revise responses, etc.
5/26/2017	Ryan Aldrich	0.70					\$ 217.00	Coordinate the processing of additional client data for attorney review, per T. Lu's request.
5/26/2017	Tony K. Lu	1.80			1.80		\$ 639.00	Continue draft of PPH response to 2nd set of interrogatories (1.4); Teleconference with Rosanne Sangiacomo re: discovery responses (.4).
5/30/2017	Rosanne M. Sangiacomo	0.10			0.10		\$ 42.00	Attention to discovery issues.
5/31/2017	Rosanne M. Sangiacomo	0.30			0.30		\$ 126.00	E-mails with D. Larson and D. Alexander.
6/1/2017	Rosanne M. Sangiacomo	2.30			2.30		\$ 966.00	Conference call with D. Larson and AJ (.3); prepare notes regarding same (1); attention to discovery issues (1).
6/2/2017	Rosanne M. Sangiacomo	0.10			0.10		\$ 42.00	Attention to discovery issues.
6/5/2017	Kristen C. Rodriguez	1.20	1.20				\$ 852.00	Attend team meeting.
6/5/2017	Rosanne M. Sangiacomo	2.50	1.20		1.30		\$ 1,050.00	Meeting with T. Amlot, K. Rodriguez, and T. Lu to discuss discovery and summary judgment strategy (1.2); analyze first interrogatory requests and FamPlan database notes (.5); conference with T. Amlot regarding same (.5); e-mails regarding discovery issues (.3).
6/5/2017	Tiffany L. Amlot	1.40	0.40		1.00		\$ 987.00	Address discovery (1) and summary judgment (.4) issues, etc.
6/5/2017	Tony K. Lu	1.10			1.10		\$ 390.50	Participate in teleconference with T. Amlot, K. Rodriguez, R. Sangiacomo re: discovery responses.
6/6/2017	Rosanne M. Sangiacomo	0.60			0.60		\$ 252.00	Meet and confer with T. Amlot and R. Huss regarding interrogatory responses and claim form issues.

Date	Name / Invoice Number	Hours	Plds, Mtn, Brief	Research	Investigation	Interviewing	Amount	Description
6/6/2017	Tiffany L. Amlot	1.70			1.70		\$ 1,198.50	Address discovery (1); call with opposing counsel, etc. (.7).
6/7/2017	Rosanne M. Sangiacomo	0.20			0.20		\$ 84.00	E-mails with M. Falkstrom.
6/8/2017	Rosanne M. Sangiacomo	0.60			0.60		\$ 252.00	E-mails with S. Aden regarding discovery issues (.2); conference with T. Lu regarding interrogatory responses and D. Carney information (.2); e-mails with T. Amlot regarding discovery issues (.2).
6/8/2017	Alan S. Gilbert	0.40					\$ 398.00	Review order on second motion to compel and e-mails T. Amlot regarding same.
6/8/2017	Tony K. Lu	1.20			1.20		\$ 426.00	Review email chain (.2), telephone with Denny Carney (.3), revise draft of interrogatories, and internal communications with Rosanne Sangiacomo re: FamPlan (.7).
6/9/2017	Ryan Aldrich	0.30					\$ 93.00	Correspondence with R. Sangiacomo regarding technical specifications for upcoming document production.
6/9/2017	Rosanne M. Sangiacomo	3.40			3.40		\$ 1,428.00	Prepare supplemental production re: billing data and diagnosis codes per Court order (1); conference with S. Aden regarding discovery issues (1); conference with T. Amlot regarding discovery (1); telephone calls with D. Larson regarding billing data for production (.2); conference with T. Lu regarding interrogatories (.2)
6/9/2017	Tiffany L. Amlot	0.30			0.30		\$ 211.50	Review discovery issues, etc.
6/12/2017	Rosanne M. Sangiacomo	4.80			4.80		\$ 2,016.00	Prepare responses to first interrogatory requests (1.4); conference with T. Lu regarding responses to second interrogatory requests and revise same (1); conference call with T. Lu and K. Rodriguez regarding case strategy, discovery and preparation for scheduling meet and confer (1); prepare response to S. Aden e-mail re: outstanding discovery issues (1.4).
6/12/2017	Tiffany L. Amlot	1.40			1.40		\$ 987.00	Revise discovery, etc.
6/12/2017	Tony K. Lu	3.50			3.50		\$ 1,242.50	Revise draft of response to interrogatories and internal communications re: same (2.1); Participate in teleconference with Kristen Rodriguez and Rosanne Sangiacomo re: summary judgment (1.3); Telephone with Jennifer Warren Ulrick (.1)
6/12/2017	Ryan Aldrich	0.50					\$ 155.00	Prepare client documents for production to opposing counsel, per T. Lu's request.
6/13/2017	Kristen C. Rodriguez	1.50			1.50		\$ 1,065.00	Review discovery responses and order on discovery.
6/13/2017	Rosanne M. Sangiacomo	3.60	1.00		2.60		\$ 1,512.00	E-mails with S. Aden regarding discovery issues and meet and confer scheduling (.6); review and analyze Court's order on motion to compel 2 and prepare notes to circulate to team in preparation for meet and confer call (1); analyze billing data for claims identified by Court (1); follow-up e-mail to D. Larson regarding additional billing data reports needed (.5); e-mail to J. Warren-Ulrich (.3); mails with K. Rodriguez and T. Lu regarding preparation for meet and confer (.2).
6/13/2017	Tiffany L. Amlot	0.50			0.50		\$ 352.50	Address discovery issues, etc.
6/13/2017	Tony K. Lu	1.50			1.50		\$ 532.50	Start review of Relativity documents related to emails concerning audit (1.2); Review email of R. Sangiacomo and portions of Order of Court related to completion of discovery (.3).
6/14/2017	Kristen C. Rodriguez	0.50			0.50		\$ 355.00	Prepare for status conference with court.
6/14/2017	Rosanne M. Sangiacomo	4.20		3.20			\$ 1,764.00	E-mails with e-mails with K. Rodriguez and T. Lu regarding preparation for meet and confer (1); conference with K. Rodriguez regarding same (1); e-mails with T. Lu and J. Warren-Ulrich re: discovery issues (.5); meet and confer conference call with S. Aden regarding proposed schedule, agenda and upcoming status conference (.5); prepare notes following up on meet and confer and circulate to case team (1); follow up phone call with J. Warren-Ulrich (.2)
6/14/2017	Tony K. Lu	4.80			4.80		\$ 1,704.00	Continue review of Relativity emails related to Medicaid Audit (2.2); Email communications with Jennifer Warren Ulrick (.6); Participate in teleconference with Steve Aden and Roseanne Sangiacomo re: meet and confer (1.5); Draft supplemental responses to request for production (.5)
6/15/2017	Kristen C. Rodriguez	1.60			1.60		\$ 1,136.00	Calls with team regarding discovery schedule and attention to correspondence regarding same analyze (1); revise discovery schedule (.6).

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6/15/2017	Rosanne M. Sangiacomo	5.30			5.30		\$ 2,226.00	Attention to discovery issues (.3); internal conferences and e-mails with T. Lu and K. Rodriguez regarding follow up on meet and confer (1); review plaintiff's proposed agenda from S. Aden (1); add and revise proposed agenda and circulate internally (1); conference with T. Amlot, K. Rodriguez, and A. Gilbert regarding proposed additions (1); follow up call and e-mails with S. Aden (.5); finalize and file joint proposed schedule for status conference (.5).
6/15/2017	Alan S. Gilbert	1.50					\$ 1,492.50	Conferences with Dentons lawyers re. proposed schedule
6/15/2017	Tiffany L. Amlot	2.30			2.30		\$ 1,621.50	Team call re: status and strategy (2); communications with opposing counsel; etc. (.3).
6/15/2017	Tony K. Lu	1.00			1.00		\$ 355.00	Review and comment on draft agenda to be filed with court (.3); Attention to and revise and serve supplemental response to request for production (.7).
6/16/2017	Rosanne M. Sangiacomo	5.90			5.90		\$ 2,478.00	Attention to discovery issues (1); multiple phone calls and conferences regarding billing data with D. Larson (.9); conference with T. Amlot and K. Rodriguez re: same (.5); review additional personnel files and prepare for production Monday (1.5); e-mails with litigation support re: same (.5); review and analyze abortion billing data (.5); e-mails with S. Aden regarding additional fields production (1).
6/16/2017	Rupert Ellison, Jr.	1.00					\$ 310.00	Relativity database management and support - Load client documents received from R. Sangiacomo.
6/16/2017	Rupert Ellison, Jr.	0.80					\$ 248.00	Relativity database management and support - create production of responsive documents and perform qc; for bates range PPH 10957 - PPH 11231
6/17/2017	Rosanne M. Sangiacomo	1.40			1.40		\$ 588.00	Review and analyze abortion billing data (1); e-mails with D. Larson regarding same (.4).
6/18/2017	Tony K. Lu	0.60			0.60		\$ 213.00	Continue review of documents for relevancy in Relativity related to Audit emails.
6/19/2017	Kristen C. Rodriguez	4.30			4.30		\$ 3,053.00	Prepare for and attend status conference (2.3); follow-up analysis with R. Sangiacomo regarding same (2).
6/19/2017	Ryan Aldrich	0.80					\$ 248.00	Prepare documents for production and coordinate shipment to opposing counsel, per R. Sangiacomo's request.
6/19/2017	Rosanne M. Sangiacomo	5.50			5.50		\$ 2,310.00	Meet with K. Rodriguez in preparation for status conference (2); call with D. Larson in preparation for same (.5); participate in telephonic status conference with Magistrate Judge Bremer and Judge Jarvey (1); prepare notes in follow up of status conference (.5); finalize and quality check production of additional personnel files (.5); produce personnel files (.5); conference with D. Larson regarding billing data (.5).
6/19/2017	Tony K. Lu	1.10			1.10		\$ 390.50	Internal email communications related to review and production of audit emails and standing order emails (.5); create chart related to production (.6)
6/20/2017	Rosanne M. Sangiacomo	1.30			1.00		\$ 546.00	Prepare list of action items and task following status conference on 6/19 (.2); circulate same to case team (.1); call with T. Lu regarding claim forms issue (.5); call with T. Lu and client (.5)
6/20/2017	Tony K. Lu	1.40			1.40		\$ 497.00	Continue review of emails in Relativity for relevance for purpose of preparing for production (.8); Teleconference with Rosanne Sangiacomo and client (.6)
6/21/2017	Kristen C. Rodriguez	0.50					\$ 355.00	Preparation for internal status meeting.
6/21/2017	Rosanne M. Sangiacomo	1.20			1.20		\$ 504.00	Review and analyze recent court order following status conference (.2); e-mails with M. Falkstrom and J. Warren-Ulrich (.5); phone call with M. Falkstrom regarding discovery matters and case strategy (.5).
6/22/2017	Rosanne M. Sangiacomo	1.30			1.30		\$ 546.00	Call with D. Alexander (.3); e-mails with D. Alexander and J. Warren-Ulrich (.5); review and analyze additional abortion billing records (.5).
6/22/2017	Tony K. Lu	0.40			0.40		\$ 142.00	Continue review of Relativity documents related to audit for production.
6/23/2017	Keshia W. Lipscomb	1.20					\$ 528.00	Analyzed Iowa district court's Order on motion to dismiss, in preparation for call to discuss research issues.

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6/23/2017	Keshia W. Lipscomb	0.60					\$ 264.00	Reviewed Memorandum in Support of Motion to Dismiss, standing order, and case notes, in preparation for beginning Thayer research.
6/23/2017	Ryan Aldrich	1.10					\$ 341.00	Perform searches to isolate documents for production to opposing counsel, per T. Lu's request. .4 Prepare spreadsheets for production to opposing counsel, per R. Sangiacomo's request. .7
6/23/2017	Keshia W. Lipscomb	0.50					\$ 220.00	Participated in call with Kristen Rodriguez and Rosanne Sangiacomo to discuss research issues for Thayer case.
6/23/2017	Kristen C. Rodriguez	1.60			1.60		\$ 1,136.00	Calls with team regarding task list and research needed.
6/23/2017	Kristen C. Rodriguez	0.70			0.70		\$ 497.00	Work on strategy for communications to plaintiff's counsel regarding new data set.
6/23/2017	Rosanne M. Sangiacomo	4.20	2.00		2.50		\$ 1,764.00	Telephone conference with K. Rodriguez and T. Lu regarding discovery matters, summary judgment and case strategy (1); telephone conference with K. Rodriguez and K. Liscomb regarding case background and summary judgment (1); review, analyze and prepare for production abortion billing data with additional fields (1.5); confer with K. Rodriguez regarding same (.5); attention to discovery issues (.2).
6/23/2017	Tony K. Lu	1.50			1.50		\$ 532.50	Continue review of Relativity documents and meeting minutes and internal communication re: production (.4); Participate in team teleconference related to action items (1.1)
6/24/2017	Rosanne M. Sangiacomo	0.30			0.30		\$ 126.00	Review and analyze discovery letter from R. Hixson.
6/25/2017	Tony K. Lu	0.60			0.60		\$ 213.00	Review and redact additional Relativity documents related to Federal Program Review.
6/26/2017	Kristen C. Rodriguez	1.10			1.10		\$ 781.00	Communications regarding e-discovery issues.
6/26/2017	Rosanne M. Sangiacomo	6.40			6.40		\$ 2,688.00	Review and redact Iowa Medicaid audit documents for production (1); conference with K. Rodriguez regarding discovery issues (.4); analyze abortion billing data in order to create patient list for report on patient files (1); conference with N. Braendel regarding trip to Iowa (1); e-mails with J. Buessel and J. Warren regarding records issues (1); phone call with D. Larson regarding finalizing production of abortion billing data (.5); finalize production and draft cover e-mail to opposing counsel (1); send out abortion billing data (.5).
6/26/2017	Tony K. Lu	1.10			1.10		\$ 390.50	Review motion to compel letter from Plaintiffs and start review case law on standard re: same (.7); Continue review Relativity documents pre-production (.4)
6/27/2017	Keshia W. Lipscomb	3.50					\$ 1,540.00	Research 8th Circuit authority for cases evaluating the reasonable interpretation defense in the context of False Claims Act, for use in ongoing discovery and later summary judgment briefing.
6/27/2017	Kristen C. Rodriguez	0.40			0.40		\$ 284.00	Calls with internal team regarding meet and confer and analysis of records issues.
6/27/2017	Rosanne M. Sangiacomo	3.90			3.90		\$ 1,638.00	Review and redact Iowa Medicaid audit documents for production (1.5); conference with K. Rodriguez regarding discovery issues (.4); conference with N. Braendel regarding trip to Iowa; e-mails with J. Buessel and J. Warren regarding records issues (.5); review records management company policies and procedures (.5); prepare for meetings in Iowa tomorrow (1).
6/27/2017	Tony K. Lu	0.50			0.50		\$ 177.50	Teleconference with Rosanne Sangiacomo re: discovery matters and email clients re: same.
6/28/2017	Keshia W. Lipscomb	2.00					\$ 880.00	Research 8th Circuit authority for cases discussing specific evidence considered when evaluating the reasonable interpretation defense in the context of False Claims Act, for use in ongoing discovery and later summary judgment briefing.
6/28/2017	Kristen C. Rodriguez	0.50	0.50				\$ 355.00	Review key cases on reasonable interpretation defense.
6/28/2017	Kristen C. Rodriguez	0.20			0.20		\$ 142.00	Emails with internal team regarding meet and confer.
6/28/2017	Kristen C. Rodriguez	2.20			2.20		\$ 1,562.00	Prepare for and attend conference with opposing counsel; follow-up analysis regarding same.

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6/28/2017	Rosanne M. Sangiacomo	15.00			15.00		\$ 6,300.00	Travel to and from Des Moines Iowa in order to go to off-site hard copy storage warehouse (6.5) and review hard copy and electronic patient medical files to provide report per Court's order (3) meetings with J. Warren-Ulrich, D. Alexander, and M. Bailey (4); meet and confer conference call with R. Hixson, S. Aden, K. Rodriguez and T. Lu (1); follow up call with K. Rodriguez and T. Lu regarding discovery issues (1).
6/28/2017	Tony K. Lu	3.80	2.20		1.60		\$ 1,349.00	Conduct legal research on standards related to interrogatories on PPH obligation to respond and write email re: same (2.2); Participate in internal teleconference and meet and confer session with opposing counsel re: discovery (1.6)
6/29/2017	Keshia W. Lipscomb	0.70					\$ 308.00	Prepared for and participated in call with Kristen Rodriguez and Rosanne Sangiacomo to discuss initial research findings on reasonable interpretation issue, as relevant to summary judgment motion.
6/29/2017	Kristen C. Rodriguez	1.10			1.10		\$ 781.00	Call and follow up correspondence regarding research on reasonable interpretation.
6/29/2017	Kristen C. Rodriguez	0.70			0.70		\$ 497.00	Edits to letter to opposing counsel regarding meet and confer.
6/29/2017	Kristen C. Rodriguez	0.30			0.30		\$ 213.00	Research regarding answers to interrogatories.
6/29/2017	Rosanne M. Sangiacomo	5.30	3.80		1.50		\$ 2,226.00	Prepare report on patient health records (2.8); telephone call with K. Liscomb and K. Rodriguez regarding research and analysis issues for summary judgment on FCA defenses (.5); call with K. Rodriguez regarding follow up to meet and confer and discovery action items (.5); e-mails with PPH employees (1); e-mails with T. Lu and K. Rodriguez regarding discovery strategy and issues (.5).
6/29/2017	Tony K. Lu	2.30			2.30		\$ 816.50	Review case law by PPH and write email internal email response proposing course of action (.7); Review interrogatory response and draft correspondence to Russ Hixson re: interrogatories (.6); Examine list of documents in storage boxes for purpose of responding to interrogatories (.6); Telephone communication with Jennifer Warren Ulrick re: storage of documents (.4)
6/30/2017	Kristen C. Rodriguez	0.90			0.90		\$ 639.00	Edits to correspondence with plaintiff's counsel regarding document review and calls re: same.
6/30/2017	Rosanne M. Sangiacomo	3.40			3.40		\$ 1,428.00	Prepare report on patient health records (1); conference with K. Rodriguez regarding same (.4); revise and finalize report on patient health records (1); e-mails with J. Warren-Ulrick and M. Falkstrom (.5); e-mails with T. Lu and K. Rodriguez regarding discovery strategy and issues (.5).
6/30/2017	Tony K. Lu	0.60			0.60		\$ 213.00	Email communication with Jennifer Warren Ulrich (.2); Review and provide comments re: audit letter to plaintiffs (.4).
7/1/2017	Rosanne M. Sangiacomo	0.80			0.80		\$ 336.00	Prepare list of patient names and information for look up on electronic CDs.
7/1/2017	Tony K. Lu	0.10			0.10		\$ 35.50	Attention to and review third motion to compel.
7/3/2017	Tony K. Lu	0.20			0.20		\$ 71.00	Review third motion to compel by Plaintiff.
7/5/2017	Rupert Ellison, Jr.	0.60					\$ 186.00	Relativity database management and support - Download and audit files received from R. Sangiacomo; prepare and send to vendor for processing and import into Relativity along with statement of work.
7/5/2017	Alan S. Gilbert	0.40					\$ 398.00	Conference with K. Rodriguez and R. Sangiacomo regarding ESI issues (.4)
7/5/2017	Keshia W. Lipscomb	1.50					\$ 660.00	Reviewed and analyzed additional authority, including trial court filings and briefings, regarding reasonable interpretation defense under False Claims Act.
7/5/2017	Keshia W. Lipscomb	3.30					\$ 1,452.00	Drafted detailed analysis of reasonable interpretation defense under False Claims Act at summary judgment phase, including summaries of key cases, list of evidence used and cited as relevant in previous cases, and issue of burden shifting.
7/5/2017	Kristen C. Rodriguez	1.70			1.70		\$ 1,207.00	Team call on status regarding various items (1); call with R. Sangiacomo on discovery matters (.3); correspondence with T. Amlot regarding production decision re: audit files from FOIA (.4).
7/5/2017	Ryan Aldrich	2.70					\$ 837.00	Prepare documents for production to opposing counsel, per case team request.

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7/5/2017	Rosanne M. Sangiacomo	4.30			4.30		\$ 1,806.00	Update action items task list and conference with K. Rodriguez regarding same (.3); weekly telephonic meeting with case team (2); finalize Iowa Medicaid audit documents for production and prepare cover letter for same (1); e-mails with R. Aldrich regarding same (.5); quality control and send out production (.5).
7/5/2017	Tony K. Lu	1.70			1.70		\$ 603.50	Participate in conference call with Kristen Rodriguez and Rosanne Sangiacomo re: updated to-do list (1); Review Planned Parenthood documents for production (.6); Email communication with Jennifer Warren Ulrich re: follow-up (.1)
7/6/2017	Rosanne M. Sangiacomo	0.40			0.40		\$ 168.00	Attention to discovery issues (.2); telephone calls and e-mails with client (.2).
7/6/2017	Tony K. Lu	0.70			0.70		\$ 248.50	Place call to Jennifer Warren Ulrich (.1); Start compilation of documents in preparation to draft resistance to third motion to compel (.6)
7/7/2017	Rosanne M. Sangiacomo	0.10					\$ 42.00	Attention to discovery issues.
7/7/2017	Tony K. Lu	1.80	1.80				\$ 639.00	Conduct legal research on Rule 33 and permissibility of subpart interrogatories for opposition to motion to compel (1.8)
7/8/2017	Tony K. Lu	1.60	1.60				\$ 568.00	Start draft of opposition to third motion to compel (1.6)
7/9/2017	Tony K. Lu	3.10	3.10				\$ 1,100.50	Continue draft of resistance to third motion to compel (3.1)
7/10/2017	Kristen C. Rodriguez	2.10	1.00		1.10		\$ 1,491.00	Review and edit response to third motion to compel (1); prepare for and attend team meeting (.9); attention to correspondence regarding interviews of witnesses (.2).
7/10/2017	Rosanne M. Sangiacomo	4.00	1.00		3.00		\$ 1,680.00	Analyze and reformat list of OCP patients for sampling look up and communicate with J. Warren-Ulrich (1); update action items task list and circulate to team (1); weekly team conference (1) review draft of resistance to third Motion to Compel from T. Lu and prepare revisions (1).
7/10/2017	Tony K. Lu	3.80	1.40	1.00	1.40		\$ 1,349.00	Continue draft of PPH resistance to third motion to compel (1.4); Continue legal research on Rule 33 (1); Meet and confer with Kristen Rodriguez and Rosanne Sangiacomo re: weekly updated meeting on discovery matters (1.1); Email communication with Jennifer Warren Ulrich (.3)
7/11/2017	Kristen C. Rodriguez	0.50			0.50		\$ 355.00	Attention to correspondence regarding plan from plaintiffs and analysis of same.
7/11/2017	Rosanne M. Sangiacomo	6.40	3.30		3.10		\$ 2,688.00	Review draft of resistance to third Motion to Compel from T. Lu (1); analyze arguments and revise brief (2.3); telephone calls with J. Warren-Ulrich and D. Alexander regarding discovery issues (1); review discovery correspondence from R. Hixson and confer with K. Rodriguez regarding same (1.1); e-mails with team regarding discovery issues (1).
7/11/2017	Tony K. Lu	0.50			0.50		\$ 177.50	Start draft of supplemental responses to interrogatories (.4); Telephone with Jennifer Warren Ulrich (.1)
7/12/2017	Alan S. Gilbert	0.20					\$ 199.00	Review court filings and order.
7/12/2017	Keshia W. Lipscomb	2.40					\$ 1,056.00	Research 8th Circuit authority regarding public disclosure defense under False Claims Act.
7/12/2017	Keshia W. Lipscomb	1.60					\$ 704.00	Review and analyze specific facts in most relevant 8th Circuit public disclosure cases.
7/12/2017	Kristen C. Rodriguez	1.00			1.00		\$ 710.00	Correspondence regarding training documents, interviews, motion to extend; review letters from counsel regarding review of documents.
7/12/2017	Rosanne M. Sangiacomo	3.80	3.80				\$ 1,596.00	Research and analyze use of interrogatories in False Claims Act actions (1.3); revise draft resistance brief and circulate new draft (1.1); draft response letter to R. Hixson regarding electronic patient records (.6); phone call with J. Warren-Ulrich (.4); review and finalize motion for extension (.4).
7/12/2017	Tony K. Lu	0.80	0.60		0.20		\$ 284.00	Draft motion for extension of time and coordinate filing re: same (.5); Telephone contact message to Darren Alexander (.1); Internal email communications re: updates to discovery matters (.2).
7/13/2017	Keshia W. Lipscomb	0.30					\$ 132.00	Email Kristen Rodriguez and Rosanne Sangiacomo regarding call to discuss public disclosure research and begin drafting notes in summary to prepare for call.

Date	Name / Invoice Number	Hours	Plds, Mtn, Brief	Research	Investigation	Interviewing	Amount	Description
7/13/2017	Keshia W. Lipscomb	0.60					\$ 264.00	Analyze authority specifically addressing whether changes in public disclosure defense are retroactive as to date of alleged act or omission or date of filing of lawsuit.
7/13/2017	Kristen C. Rodriguez	0.40			0.40		\$ 284.00	Review letters from counsel regarding electronic sampling.
7/13/2017	Rosanne M. Sangiacomo	1.80			1.80		\$ 756.00	Internal e-mails with team regarding discovery issues (.2); follow up with phone call with T. Lu regarding information on electronic claims process (.6); call with A. Strom regarding strategy for exporting patient files (.4); conference with K. Rodriguez regarding her comments to reply letter to R. Hixson on patient files and incorporate comments (.6).
7/13/2017	Tony K. Lu	1.40	1.40				\$ 497.00	Review 3rd Motion to Compel and other supporting documents and prepare questions for Sue Haskell and Paula Laube (1.4)
7/14/2017	Kristen C. Rodriguez	2.60	0.60	2.00			\$ 1,846.00	Review MTD order and plaintiff's third motion to compel and response to same (.6); review research regarding reasonable interpretation defense (2).
7/14/2017	Rosanne M. Sangiacomo	1.20			1.20		\$ 504.00	Internal emails with team regarding discovery issues (.7); review and analyze files from J. Warren-Ulrich (.5).
7/14/2017	Tony K. Lu	0.30					\$ 106.50	Initial teleconference with Jennifer Warren Ulrick and Paula Laube (0.3).
7/15/2017	Rosanne M. Sangiacomo	1.60	1.00		0.60		\$ 672.00	Review K. Rodriguez comments to draft resistance brief and revise in accordance with same (1); review and analyze data from client (.4); draft update e-mail to M. Falkstrom (.2).
7/16/2017	Keshia W. Lipscomb	1.00					\$ 440.00	Reviewed additional authority regarding public disclosure as defense against False Claims Act, in preparation for discussion call regarding research progress.
7/16/2017	Rosanne M. Sangiacomo	2.10		2.10			\$ 882.00	Review research on public disclosure, original source and audit defenses from K. Liscomb.
7/16/2017	Tony K. Lu	0.50			0.50		\$ 177.50	Attention to and email communication with Sue Haskell and Paula Laube.
7/17/2017	Keshia W. Lipscomb	0.60					\$ 264.00	Prepare for and participate in call with Kristen Rodriguez and Rosanne Sangiacomo to discuss public disclosure and audit defense research issues.
7/17/2017	Kristen C. Rodriguez	3.00			3.00		\$ 2,130.00	Call regarding audit research (.5); call with R. Sangiacomo regarding motion to compel response (.5); review audit documentation (.5); attend team meeting (1); correspondence regarding motion to compel response (.5).
7/17/2017	Rosanne M. Sangiacomo	7.90			7.90		\$ 3,318.00	Follow-up investigation on discovery issues relating to abortion-services patient files and OCP patient files (2.3); weekly team meeting call (1.1); call with K. Rodriguez and K. Liscomb regarding summary judgment/defenses research (1.3); analyze patient records spreadsheet and conference with K. Rodriguez regarding same (3.2).
7/17/2017	Tony K. Lu	1.80			1.80		\$ 639.00	Participate in weekly teleconference with Kristen Rodriguez and Rosanne Sangiacomo re: updated items for discovery (1); Review and input information on patient chart for resistance to third motion to compel (.5); Email communications with Paula Laube (.1); Telephone with Darren Alexander re: 837 forms (.2)
7/18/2017	Rosanne M. Sangiacomo	8.20	8.20				\$ 3,444.00	Add response regarding factual issues on standing order to resistance brief (4); review and analyze key file documents for same (2); edit brief and circulate proposed final version (2.2).
7/18/2017	Alan S. Gilbert	1.00					\$ 995.00	Review draft response to Plaintiff's Third Motion to Compel and conferences with T. Amlot regarding same.
7/18/2017	Tiffany L. Amlot	3.70	3.70				\$ 2,608.50	Revise brief in opposition to motion to compel, including conferences as to same.
7/18/2017	Tony K. Lu	0.50	0.50				\$ 177.50	Review and comment on latest draft of PPH resistance motion to third motion to compel (.5); Review PPH correspondence related to sampling testing (.2)
7/19/2017	Rosanne M. Sangiacomo	1.90			1.90		\$ 798.00	Attention to discovery and scheduling issues (.6); multiple conferences with K. Rodriguez and T. Lu regarding same (.5); analyze data from PPH (.5); telephone call with J. Warren-Ulrich (.3)
7/19/2017	Tony K. Lu	0.70			0.70		\$ 248.50	Talk with Dan Larson.

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Date	Name / Invoice Number	Hours	Plds, Mtn, Brief	Research	Investigation	Interviewing	Amount	Description
7/20/2017	Kristen C. Rodriguez	2.70			2.70	2.70	\$ 1,917.00	Prepare for and attend witness interviews.
7/20/2017	Rosanne M. Sangiacomo	1.50			1.50		\$ 630.00	Attention to discovery and scheduling issues (.5); review medical records of two sample patients from Iowa trip (.5); conference with T. Lu regarding discovery (.2); telephone call with M. Falkstrom (.3).
7/20/2017	Tony K. Lu	2.80			2.80		\$ 994.00	Email to Paula Laube (.3); Teleconference with Kristen Rodriguez re: recap call with Sue Haskell (.3); Plan and prepare for call with Sue Haskell and Jennifer Warren Ulrick (.5); Telephone with Sue Haskell and Jennifer Warren Ulrick and Kristen Rodriguez re: investigation (1.7)
7/21/2017	Rosanne M. Sangiacomo	0.50			0.50		\$ 210.00	Attention to discovery issues.
7/21/2017	Tiffany L. Amlot	2.70				2.70	\$ 1,903.50	Participate in witness interview; respond to discovery issues, etc.
7/21/2017	Rupert Ellison, Jr.	0.20					\$ 62.00	Download files from FTP site and copy to network shared drive for case team access.
7/21/2017	Tony K. Lu	2.40			2.40		\$ 852.00	Prepare for Paula Laube teleconference and email communication with same (.4) Teleconference with Jennifer Warren Ulrick, Paula Laube, and Tiffany Amlot (1.6); Talk to Dan Larson (.4)
7/23/2017	Tony K. Lu	1.80			1.80		\$ 639.00	Revise supplemental responses to 2nd Set of Interrogatories to incorporate statements from Sue Haskell and Paula Laube (1.8)
7/24/2017	Kristen C. Rodriguez	1.50			1.50		\$ 1,065.00	Call with team (1); call with plaintiff's counsel (.5).
7/24/2017	Rosanne M. Sangiacomo	4.50			5.50		\$ 1,890.00	Attention to discovery issues and update task list (.3); weekly team strategy call (1); internal emails with case team regarding discovery items (.2); review and analyze draft supplemental interrogatory responses (.8); follow up meet and confer with R. Hixson, S. Aden, T. Amlot and K. Rodriguez regarding abortion-services sampling issue and OCP/interrogatories issues (1); prepare draft joint agenda for status conference and circulate to opposing counsel (1); call with I. Schwartzburg regarding review of OCP patient medical files for interrogatory responses (.2).
7/24/2017	Rupert Ellison, Jr.	1.20					\$ 372.00	Work with data set to import into review database according to established specifications; Update search indexes as necessary and appropriate; Perform data validation steps and document all relevant details.
7/24/2017	Tiffany L. Amlot	2.00			2.00		\$ 1,410.00	Respond to discovery issues, etc.
7/24/2017	Ilya Schwartzburg	4.90					\$ 2,131.50	Review hundreds of pages in medical records and create chart of relevant dates and details to respond to interrogatories.
7/24/2017	Tony K. Lu	1.90			1.90		\$ 674.50	Revise draft of supplemental responses to Plaintiff's interrogatories and internal email communication re: same (.7); Participate in teleconference with Tiffany Amlot Kristen Rodriguez and Rosanne Sangiacomo re: discovery matters (1); Multiple internal email communications re: discovery matters (.2)
7/25/2017	Kristen C. Rodriguez	1.70			1.70		\$ 1,207.00	Review interrogatory responses (.3); call with witness (.4); preparation for court hearing (1).
7/25/2017	Rosanne M. Sangiacomo	4.30	1.90		2.40		\$ 1,806.00	Attention to discovery issues (.3); internal emails with case team regarding discovery items (.3); multiple conferences and e-mails with I. Schwartzburg (.8); review and analyze plaintiff's reply in support of third motion to compel (1.3); confer with T. Amlot regarding strategy for argument on motion to compel and status hearing (.6); prepare notes for status hearing and argument tomorrow (1).
7/25/2017	Ilya Schwartzburg	6.20					\$ 2,697.00	Review hundreds of pages in medical records and create chart of relevant dates and details to respond to interrogatories.
7/25/2017	Tiffany L. Amlot	5.10			2.00	3.10	\$ 3,595.50	Participate in witness interview (3.1); draft letter to plaintiffs (1); respond to discovery issues, etc. (1).
7/25/2017	Tony K. Lu	2.20	0.90		1.30		\$ 781.00	Teleconference with Becky Parrish and Jennifer Warren Ulrick re: interrogatories (.7); Revise draft supplemental responses to second interrogatories (.5); Review Reply brief to Third Motion to Compel (.1); Teleconference with Dan Larson and Darren Alexander and Rosanne Sangiacomo (.8); Email and telephone communication with Jennifer Warren Ulrick (.1).

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Date	Name / Invoice Number	Hours	Plds, Mtn, Brief	Research	Investigation	Interviewing	Amount	Description
7/26/2017	Keshia W. Lipscomb	1.90					\$ 836.00	Begin drafting summary of public disclosure defense to False Claims Act, outlining issues as addressed in previous memorandum and as relevant to upcoming motions and briefing.
7/26/2017	Keshia W. Lipscomb	3.00					\$ 1,320.00	Review and analyze federal authority specifically to address potential audit defense to False Claims Act.
7/26/2017	Kristen C. Rodriguez	1.50			1.50		\$ 1,065.00	Attend court hearing.
7/26/2017	Rosanne M. Sangiacomo	3.90	3.90				\$ 1,638.00	Prepare for motion to compel argument and status conference hearing (2.4); review meet and confer letters and key file materials for same (1.2); follow up conference with case team (.3).
7/26/2017	Tiffany L. Amlot	3.40			3.40		\$ 2,397.00	Court status (2) conference and team meetings re same (1.4).
7/26/2017	Tony K. Lu	0.10			0.10		\$ 35.50	Telephone with Kristen Rodriguez re: Iowa Medicaid audits (.1)
7/27/2017	Keshia W. Lipscomb	1.10					\$ 484.00	Begin drafting summary of additional findings analyzing whether failure of audit to identify problems negates later liability under False Claims Act.
7/27/2017	Keshia W. Lipscomb	1.80					\$ 792.00	Review and analyze federal authority to determine whether failure of audit to identify problems negates later liability under False Claims Act.
7/27/2017	Ilya Schwartzburg	1.60					\$ 696.00	Create pdfs with specific pages from patient medical records.
7/27/2017	Kristen C. Rodriguez	1.10			1.10		\$ 781.00	Edits to second set of interrogatory responses.
7/27/2017	Rosanne M. Sangiacomo	1.70			1.70		\$ 714.00	Prepare draft FOIA request and letter to Iowa Medicaid (.7); draft e-mail J. Warren-Ulrich (.5); conference with T. Lu and T. Amlot regarding second interrogatory responses (.5).
7/27/2017	Tiffany L. Amlot	2.30			2.30		\$ 1,621.50	Respond to discovery issues (2); team call re: same, etc. (.3).
7/27/2017	Tony K. Lu	1.70			1.70		\$ 603.50	Participate in teleconference with Kristen Rodriguez and Tiffany Amlot re: supplemental interrogatories (1.7)
7/28/2017	Rosanne M. Sangiacomo	1.90			1.90		\$ 798.00	Review and analyze discovery correspondence from R. Hixson (.7); prepare update e-mail to M. Falkstrom (.4); prepare e-mail to J. Warren-Ulrich (.4); conference with T. Amlot regarding discovery issues (.4).
7/31/2017	Rosanne M. Sangiacomo	1.00			1.00		\$ 420.00	Attention to discovery issues (.4); update weekly task and action items list (.3); internal e-mails with team regarding discovery and scheduling issues (.3).
7/31/2017	Tony K. Lu	2.20			2.20		\$ 781.00	Revise supplemental responses to second set of interrogatories (1.9); Revise drafts of open records request to IME (.3)
8/1/2017	Kristen C. Rodriguez	0.50			0.50		\$ 355.00	Attend team call.
8/1/2017	Rosanne M. Sangiacomo	1.30			1.30		\$ 546.00	Weekly team call to discuss discovery strategy, action items and outstanding issues (.4); revise letters to Iowa Medicaid (.4); prepare follow up e-mail to opposing counsel on discovery issues (.5).
8/1/2017	Tiffany L. Amlot	3.10			3.10		\$ 2,185.50	Draft demand to plaintiffs (2.7); edit discovery responses; etc. (.4).
8/1/2017	Tony K. Lu	0.80			0.80		\$ 284.00	Attend team call.
8/2/2017	Keshia W. Lipscomb	1.00					\$ 440.00	Continue drafting summary of additional findings discussing audit defense.
8/2/2017	Keshia W. Lipscomb	1.50					\$ 660.00	Review and analyze federal authority discussing materiality requirement under False Claims Act, with focus on relevance of prior audits and timing of those audits.
8/2/2017	Kristen C. Rodriguez	0.30			0.30		\$ 213.00	Attention to correspondence regarding interrogatories.
8/2/2017	Rosanne M. Sangiacomo	0.20			0.20		\$ 84.00	Attention to discovery issues.
8/2/2017	Tiffany L. Amlot	1.60			1.60		\$ 1,128.00	Continue revisions to discovery responses and communications re same, etc.
8/2/2017	Tony K. Lu	0.90			0.90		\$ 319.50	Revise and proofread draft of supplemental response to second set of interrogatories and communicate with client and opposing counsel re: same (.9)
8/3/2017	Rosanne M. Sangiacomo	2.10					\$ 882.00	Prepare supplemental response to first interrogatories; review notes from I. Schwartzburg on OCP records; attention to discovery issues; review correspondence from S. Aden regarding abortion-services claims; call with J. Warren-Ulrich.

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Date	Name / Invoice Number	Hours	Plds, Mtn, Brief	Research	Investigation	Interviewing	Amount	Description
8/3/2017	Tracy R. Myrick	0.80					\$ 156.00	Work with data set to import into review database according to established specifications; Update search indexes as necessary and appropriate; Perform data validation steps and document all relevant details.
8/3/2017	Suzanne D. Smith	0.90					\$ 283.50	Review/revise draft interrogatory answers.
8/3/2017	Ryan Aldrich	0.80					\$ 248.00	Assess, organize, and prepare data for load into review database; Draft and transmit specifications for same. .5 Finalize quality control process for new data set prior to releasing to case team; Update review database with tracking information; Draft and circulate status update and details for deliverable. .3
8/4/2017	Rosanne M. Sangiacomo	4.60			4.60		\$ 1,932.00	Review and analyze OCP patient records (3.6) and prepare charts for exhibits to supplemental interrogatory responses (1).
8/4/2017	Tiffany L. Amlot	1.80			1.80		\$ 1,269.00	Address discovery issues, etc.
8/4/2017	Tony K. Lu	1.20			1.20		\$ 426.00	Review and redact supplemental production involving additional patient files (.9); Teleconference with Rosanne Sangiacomo re: discovery matters (.3)
8/4/2017	Rupert Ellison, Jr.	1.60					\$ 496.00	Prepare documents for production to opposing counsel, per case team request.
8/4/2017	Rupert Ellison, Jr.	0.60					\$ 186.00	Work with data set to import into review database according to established specifications; Update search indexes as necessary and appropriate; Perform data validation steps and document all relevant details.
8/7/2017	Rosanne M. Sangiacomo	1.30			1.30		\$ 546.00	Update action items list (.3); attention to discovery issues (.5); review and analyze abortion-related health records received from client and prepare for loading in relativity (.5).
8/8/2017	Kristen C. Rodriguez	1.60			1.60		\$ 1,136.00	Attend team call.
8/8/2017	Rosanne M. Sangiacomo	2.20			2.20		\$ 924.00	Weekly team call to discuss case strategy; e-mails with litigation support regarding loading new records received from PPH (1.8); prepare e-mail with updated information on OCP and abortion-related document collection and analysis issues for T. Amlot and K. Rodriguez (.4).
8/8/2017	Tony K. Lu	0.20			0.20		\$ 71.00	Participate in teleconference with Tiffany Amlot Kristen Rodriguez Rosanne Sangiacomo re: status conference (.1); Email communication to Jennifer Warren Ulrick (.1)
8/8/2017	Alan S. Gilbert	0.30					\$ 298.50	Conference with T. Amlot and K. Rodriguez regarding strategy.
8/9/2017	Kristen C. Rodriguez	0.20			0.20		\$ 142.00	Correspondence regarding patient records.
8/9/2017	Ryan Aldrich	0.40					\$ 124.00	Assess, organize, and prepare data for load into review database; Draft and transmit specifications for same.
8/9/2017	Tony K. Lu	0.20	0.20				\$ 71.00	Review draft of supplemental report to court re: third motion to compel (.2)
8/9/2017	Alan S. Gilbert	0.40					\$ 398.00	Review plaintiff's report on discovery issues and draft defendant's report.
8/10/2017	Rupert Ellison, Jr.	1.00					\$ 310.00	Work with data set to import into review database according to established specifications; Update search indexes as necessary and appropriate; Perform data validation steps and document all relevant details.
8/10/2017	Ryan Aldrich	0.60					\$ 186.00	Finalize quality control process for new data set prior to releasing to case team; Update review database with tracking information; Draft and circulate status update and details for deliverable. .3 Create additional tags to store attorney work product and provide user access for K. Lipscomb, per K. Rodriguez's request. .3
8/10/2017	Kristen C. Rodriguez	0.80	0.40		0.40		\$ 568.00	Review prior court orders (.4) and call with K. Lipscomb regarding review of documents (.4).
8/10/2017	Tony K. Lu	0.30			0.30		\$ 106.50	Review, redact, and bates stamp additional sample documents for production (.3)
8/11/2017	Tony K. Lu	0.50			0.50		\$ 177.50	Attention to production of supplemental patient abstracts and draft communication re: same (.5)
8/13/2017	Keshia W. Lipscomb	4.00					\$ 1,760.00	Begin review of 13 patient files (approximately 750 of 1500 total pages) with focus on time period of records and types of services provided.
8/14/2017	Keshia W. Lipscomb	3.00					\$ 1,320.00	Continue review of 13 patient files (approximately 650 of 1500 total pages) with focus on time period of records and types of services provided.

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Date	Name / Invoice Number	Hours	Plds, Mtn, Brief	Research	Investigation	Interviewing	Amount	Description
8/14/2017	Tony K. Lu	0.20			0.20		\$ 71.00	Participate in weekly teleconference with Kristen Rodriguez and Tiffany Amlot re: discovery (.2)
8/15/2017	Keshia W. Lipscomb	0.90					\$ 396.00	Continue and complete review of 13 patient files (approximately 100 of 1500 total pages) with focus on time period of records and types of services provided.
8/15/2017	Keshia W. Lipscomb	1.10					\$ 484.00	Complete chart documenting review of 13 patient files designating pages within time period of records and types of services provided, for use in production.
8/15/2017	Alan S. Gilbert	0.30					\$ 298.50	Review and circulate new FCA case from the Seventh Circuit.
8/17/2017	Kristen C. Rodriguez	0.20			0.20		\$ 142.00	Correspondence with K. Lipscomb regarding patient record review.
8/18/2017	Rosanne M. Sangiacomo	0.20	0.20				\$ 84.00	Review Judge Bremer order on motions to compel.
8/18/2017	Tony K. Lu	0.40			0.40		\$ 142.00	Review and analyze Family Planning Council of Iowa's federal program review (.4)
8/21/2017	Ryan Aldrich	0.30					\$ 93.00	Audit and analyze processed client data prior to attorney review.
8/25/2017	Rosanne M. Sangiacomo	0.20			0.20		\$ 84.00	Attention to discovery issues.
9/7/2017	Rosanne M. Sangiacomo	0.20			0.20		\$ 84.00	Conference with T. Amlot regarding case status.
9/7/2017	Alan S. Gilbert	0.30					\$ 298.50	Attention to case staffing.
9/11/2017	Rosanne M. Sangiacomo	0.30			0.30		\$ 126.00	Attention to discovery issues.
9/12/2017	Kristen C. Rodriguez	1.00			1.00		\$ 710.00	Attend team meeting.
9/12/2017	Rosanne M. Sangiacomo	1.90			0.40		\$ 798.00	Update task list and circulate to case team (.6); case strategy meeting with T. Amlot and K. Rodriguez and T. Lu (.3); review discovery correspondence (1).
9/12/2017	Tony K. Lu	0.90			1.00		\$ 319.50	Teleconference with Rosanne Sangiacomo Kristen Rodriguez and Tiffany Amlot re: status on update on discovery (1)
9/13/2017	Kristen C. Rodriguez	0.40	0.40				\$ 284.00	Discovery and summary judgment planning session.
9/13/2017	Alan S. Gilbert	0.80					\$ 796.00	Conference with T. Amlot and K. Rodriguez regarding strategy (.5); e-mail T. Azorsky regarding staffing (.3)
9/14/2017	Kristen C. Rodriguez	0.20			0.20		\$ 142.00	Call with client.
9/14/2017	Rosanne M. Sangiacomo	0.40			0.40		\$ 168.00	Attention to discovery issues.
9/18/2017	Rosanne M. Sangiacomo	0.70			0.70		\$ 294.00	Attention to discovery issues including collection of additional files for abortion services patients and review Hixson letter regarding OCP patient additional production.
9/19/2017	Rosanne M. Sangiacomo	0.80			0.80		\$ 336.00	Review and analyze Hixson correspondence regarding discovery issues (.3); review OCP patient files in relativity (.3); draft response letter to Hixson (.2).
9/20/2017	Kristen C. Rodriguez	2.00	2.00				\$ 1,420.00	Attend team meeting (1); work on summary judgment issues (1).
9/20/2017	Rosanne M. Sangiacomo	2.10			2.10		\$ 882.00	Review and analyze Hixson correspondence re: discovery issues (.4); review OCP patient files in relativity (.6); draft response letter to Hixson (.5); weekly team meeting call (.5); confer with K. Rodriguez regarding response letter (.1).
9/20/2017	Alan S. Gilbert	0.30					\$ 298.50	Conferences with Dentons lawyers regarding FCA help.
9/20/2017	Tony K. Lu	0.50			0.50		\$ 177.50	Participate in teleconference with Kristen Rodriguez and Rosanne Sangiacomo concerning updated discovery matters (.5)
9/21/2017	Rosanne M. Sangiacomo	0.10			0.10		\$ 42.00	Attention to discovery issues.
9/22/2017	Rosanne M. Sangiacomo	1.20			1.20		\$ 504.00	E-mails with client (.4); revise letter to R. Hixson regarding OCP patients and supplemental production (.4); review Plaintiff's supplemental interrogatory responses (.4).
9/22/2017	Tony K. Lu	0.10			0.10		\$ 35.50	Attention to supplemental responses to interrogatories by Plaintiffs and email re: same.
9/22/2017	Alan S. Gilbert	0.50					\$ 497.50	Attention to getting help from FCA lawyer, including conference K. Rodriguez.
9/25/2017	Ilya Schwartzburg	0.20					\$ 87.00	Receive assignment for follow-up document review for follow-on production.
9/25/2017	Rosanne M. Sangiacomo	1.60			1.60		\$ 672.00	Download, organize and review patient files received from PPH (.8); emails and telephone conference with I. Schwartzburg re: review and supplemental production of OCP files (.8).
9/26/2017	Ryan Aldrich	0.20					\$ 56.00	Correspondence with R. Sangiacomo regarding additional abortion related documents to be prepared for review.
9/26/2017	Rosanne M. Sangiacomo	0.80			0.80		\$ 336.00	Prepare abortion patient files to load and emails with litigation support re: same (.4); emails with K. Liscomb re: audit materials for summary judgment analysis and upcoming document review project (.4).

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9/27/2017	Rosanne M. Sangiacomo	1.40			1.40		\$ 588.00	Weekly team status call (.7); attention to discovery issues and update action items list (.7).
9/27/2017	Tony K. Lu	2.50			2.50		\$ 887.50	Review Family Planning Council documents and prepare memo to file summarizing findings and determination of production (1.4); Participate in weekly teleconference with Kristen Rodriguez and Rosanne Sangiacomo re: discovery update (1.1).
9/27/2017	Ilya Schwartzburg	2.30					\$ 1,000.50	Review client documents to respond to follow-on production.
9/28/2017	Ilya Schwartzburg	1.80					\$ 783.00	Review client documents to respond to follow-on production.
9/28/2017	Mindy A. Marshall	3.50					\$ 1,102.50	Prepare Planned Parenthood documents for production per Rosanne Sangiacomo.
9/28/2017	Kristen C. Rodriguez	1.40			1.40		\$ 994.00	Analysis of production and strategy issues for production.
9/28/2017	Rosanne M. Sangiacomo	2.20			2.20		\$ 924.00	Emails with M. Falkstrom (.3); emails with I. Schwartzburg re: document review of OCP files (.3); conference with M. Marshall re: comparison of OCP file relevant pages to previous production (.3); analyze abortion patient sampling issue and patient files for same (.3); conference with K. Rodriguez re: advising plaintiff concerning abortion files sampling (.3); call with K. Liscomb to discuss redaction of abortion patient file as sample (.7).
9/29/2017	Kristen C. Rodriguez	0.50			0.50		\$ 355.00	Calls and correspondence regarding production.
9/29/2017	Rupert Ellison, Jr.	1.00					\$ 280.00	Work with data set to import into review database according to established specifications; Update search indexes as necessary and appropriate; Perform data validation steps and document all relevant details.
9/29/2017	Rosanne M. Sangiacomo	6.20			6.20		\$ 2,604.00	Prepare supplemental production of OCP patient file excerpts (2.5); conference with K. Rodriguez re: production and patient ID number (2.6); emails with litigation support re: same; attention to discovery issues (1.1).
9/29/2017	Mindy A. Marshall	1.00					\$ 315.00	Process Planned Parenthood documents for production.
9/29/2017	Ryan Aldrich	2.20					\$ 616.00	Assess, organize, and prepare OCP PHR documents for load into review database; Draft and transmit specifications for same. .4 Finalize quality control process for new OCP PHR documents set prior to releasing to case team; Update review database with tracking information; Draft and circulate status update and details for deliverable. .3 Assess, organize, and prepare OCP Excerpts for load into review database; Draft and transmit specifications for same. .4 Finalize quality control process for new OCP Excerpts set prior to releasing to case team; Update review database with tracking information; Draft and circulate status update and details for deliverable. .3 Prepare documents for production to opposing counsel, per R. Sangiacomo's request. .8
9/29/2017	Tony K. Lu	1.00			1.00		\$ 355.00	Start review of audit request letter and draft response re: same.
9/30/2017	Keshia W. Lipscomb	1.10					\$ 473.00	Review and analyze patient file, in preparation for strategizing regarding production of files and confidential information.
9/30/2017	Rosanne M. Sangiacomo	1.50			1.50		\$ 630.00	Review and analyze abortion and OCP patient files for patient ID number issue (.5); prepare email to J. Warren-Ulrich (.5); prepare email to R. Hixson re: abortion patient sampling (.5).
10/2/2017	Kristen C. Rodriguez	0.80			0.80		\$ 568.00	Call with FCA attorney (.4); review sample file attend team meeting (.4).
10/2/2017	Rosanne M. Sangiacomo	1.50			1.50		\$ 630.00	Review sample abortion patient file from K. Liscomb for discussion with M. Falkstrom (.7); attention to discovery issues (.8).
10/2/2017	Tony K. Lu	1.00			1.00		\$ 355.00	Participate in teleconference with PPH team members Kristen Rodriguez and Rosanne Sangiacomo (.5); Continue draft and revision of audit response letter (.5)
10/3/2017	Kristen C. Rodriguez	0.50			0.50		\$ 355.00	Call with client (.3); correspondence with opposing counsel (.2).
10/3/2017	Rosanne M. Sangiacomo	0.20			0.20		\$ 84.00	Attention to discovery issues.

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Date	Name / Invoice Number	Hours	Plds, Mtn, Brief	Research	Investigation	Interviewing	Amount	Description
10/3/2017	Ryan Aldrich	1.60					\$ 448.00	Prepare documents for attorney review, per R. Sangiacomo's request. 1.3 Finalize quality control process for new data set prior to releasing to case team; Update review database with tracking information; Draft and circulate status update and details for deliverable. .3
10/3/2017	Tracy R. Myrick	0.90					\$ 148.50	Work with data set to import into review database according to established specifications; Update search indexes as necessary and appropriate; Perform data validation steps and document all relevant details.
10/4/2017	Kristen C. Rodriguez	0.60			0.60		\$ 426.00	Prepare for and attend meet and confer with plaintiff's counsel.
10/4/2017	Rosanne M. Sangiacomo	2.00			2.00		\$ 840.00	Confer with K. Rodriguez and prepare for meet and confer with plaintiff's counsel.
10/4/2017	Tony K. Lu	0.20			0.20		\$ 71.00	Teleconference with Kristen Rodriguez and Rosanne Sangiacomo re: Form 837 and 1500.
10/5/2017	Kristen C. Rodriguez	0.80			0.80		\$ 568.00	Prepare for conference with court and opposing counsel.
10/5/2017	Rosanne M. Sangiacomo	2.20			2.20		\$ 924.00	Telephone call with D. Carney (former PPH) and T. Lu re: certification issue (.5); conference and emails with K. Rodriguez re: certification issue and other production issues (.5); emails with K. Liscomb re: abortion sample file (.4); prepare email to M. Falkstrom (.5); email R. Hixson re: joint agenda (.3).
10/5/2017	Tony K. Lu	0.90			0.90		\$ 319.50	Telephone conference with Denny Carney and write email update re: same.
10/6/2017	Keshia W. Lipscomb	0.50					\$ 215.00	Revise and redact sample patient file for production.
10/6/2017	Keshia W. Lipscomb	0.40					\$ 172.00	Draft and revise cover letter to opposing counsel with sample patient file.
10/6/2017	Kristen C. Rodriguez	1.00			1.00		\$ 710.00	Edit, finalize, and serve joint agenda, including correspondence and negotiation regarding same.
10/6/2017	Rosanne M. Sangiacomo	3.30			3.30		\$ 1,386.00	Prepare sample abortion patient file and letter re: proposal for production and redaction of files to R. Hixson (.6); attention to discovery issues including certification issue and patient ID number issue (.5); phone call and emails with J. Warren-Ulrich (.6); emails with R. Hixson re: joint agenda (.4); conference with K. Rodriguez re: joint agenda (1); incorporate changes and additions to joint agenda (.2).
10/6/2017	Tony K. Lu	0.40			0.40		\$ 142.00	Review correspondence from opposing counsel and respond to Kristen Rodriguez re: supplemental interrogatories.
10/6/2017	Ryan Aldrich	0.60					\$ 168.00	Finalize quality control process for Abortion Services Sampling Patient Charts prior to releasing to case team; Update review database with tracking information; Draft and circulate status update and details for deliverable. .4
10/6/2017	Tracy R. Myrick	0.70					\$ 115.50	Prepare documents for production to opposing counsel, per R. Sangiacomo's request. .2
10/6/2017	Alan S. Gilbert	0.50					\$ 497.50	Work with data set to import into review database according to established specifications; Update search indexes as necessary and appropriate; Perform data validation steps and document all relevant details.
10/6/2017	Ryan Aldrich	0.10					\$ 28.00	Review and comment on draft discovery schedule.
10/8/2017	Tony K. Lu	0.90			0.90		\$ 319.50	Assess, organize, and prepare production documents for load into review database; Draft and transmit specifications for same.
10/9/2017	Kristen C. Rodriguez	0.40			0.40		\$ 284.00	Continue draft and revision of audit response letter.
10/9/2017	Ryan Aldrich	0.20					\$ 56.00	Thayer: Review and edit audit letter (.2); conference with R Sangiacomo re: same (.2).
10/9/2017	Rosanne M. Sangiacomo	0.70			0.70		\$ 294.00	Finalize quality control process for recent production documents prior to releasing to case team; Update review database with tracking information; Draft and circulate status update and details for deliverable.
10/9/2017	Tony K. Lu	0.20			0.20		\$ 71.00	Update weekly action items list and conference with K. Rodriguez re: same (.4); attention to discovery issues (.3).
10/9/2017	Tony K. Lu	0.20			0.20		\$ 71.00	Attention to audit letter and pro forma figures of donated legal services re: same.

Date	Name / Invoice Number	Hours	Plds, Mtn, Brief	Research	Investigation	Interviewing	Amount	Description
10/10/2017	Rosanne M. Sangiacomo	1.50			1.50		\$ 630.00	Attention to discovery issues and prepare for status conference hearing with court (.1.); finalize production of supplemental OCP patient file pages and send to opposing counsel (.5).
10/10/2017	Rosanne M. Sangiacomo	1.50			1.50		\$ 630.00	Attention to discovery issues and prepare for status conference hearing with court (.8); finalize production of supplemental OCP patient file pages and send to opposing counsel (.7).
10/10/2017	Ryan Aldrich	0.70					\$ 196.00	Prepare documents for production to opposing counsel, per R. Sangiacomo's request.
10/10/2017	Tony K. Lu	0.10			0.10		\$ 35.50	Attention to audit response letter and internal email communications re: same.
10/11/2017	Keshia W. Lipscomb	0.20					\$ 86.00	Review and analyze authority regarding certification theory under False Claims Act.
10/11/2017	Kristen C. Rodriguez	1.00			1.00		\$ 710.00	Attend status call with court.
10/11/2017	Rosanne M. Sangiacomo	1.70			1.70		\$ 714.00	Prepare for and participate in status conference with Judge Bremer (1); conference with K. Rodriguez re: follow up from status conference (.7).
10/12/2017	Alan S. Gilbert	0.20					\$ 199.00	Review court order.
10/12/2017	Rosanne M. Sangiacomo	0.20			0.20		\$ 84.00	Attention to discovery issues.
10/13/2017	Kristen C. Rodriguez	0.40			0.40		\$ 284.00	Correspondence regarding audit letter.
10/16/2017	Kristen C. Rodriguez	0.80			0.80		\$ 568.00	Attend team meeting.
10/16/2017	Rosanne M. Sangiacomo	1.70			1.70		\$ 714.00	Weekly team call and meeting (.8); investigate certification issue (.6); attention to discovery issues (.3).
10/16/2017	Tony K. Lu	0.90			0.90		\$ 319.50	Participate in weekly teleconference with Kristen Rodriguez and Rosanne Sangiacomo re: certification issue (.8); Telephone with Penny Dickey (.1).
10/17/2017	Kristen C. Rodriguez	1.70			1.70		\$ 1,207.00	Call with fact witness (1); analysis of certification and remaining discovery issues (.7).
10/17/2017	Rosanne M. Sangiacomo	2.30			2.30		\$ 966.00	Phone calls with P. Dickey and M. Falkstrom (1); prepare bullet point notes and agendas for calls (1); attention to discovery issues (.3).
10/17/2017	Tony K. Lu	1.40			1.40		\$ 497.00	Participate in teleconference with Penny Dickey (.9); Review documents pertaining to IME production for purpose of providing to Penny Dickey (.5).
10/18/2017	Rosanne M. Sangiacomo	0.70			0.70		\$ 294.00	Prepare follow up emails to M. Falkstrom and P. Dickey.
10/18/2017	Tony K. Lu	0.10			0.10		\$ 35.50	Attention to review and location of medical document with relevant signature (.1)
10/19/2017	Tony K. Lu	0.60			0.60		\$ 213.00	Review Medicaid audit documents for relevance in connection with certification issue and/or original source issue (.6)
10/20/2017	Rosanne M. Sangiacomo	1.20			1.20		\$ 504.00	Call with J. Warren-Ulrich (.4); conference with K. Rodriguez re: same (.3); review emails from R. Hixson re: OCP issue and abortion-services claim (.3); emails with R. Hixson re: discovery issues (.1); emails with K. Liscomb re: abortion files review (.1).
10/21/2017	Keshia W. Lipscomb	3.00					\$ 1,290.00	Continue redacting sample patient files for production.
10/23/2017	Kristen C. Rodriguez	0.20			0.20		\$ 142.00	Prepare for call with L. Dahl regarding certification issue.
10/23/2017	Rosanne M. Sangiacomo	1.70			1.70		\$ 714.00	Confer with K. Rodriguez re: discovery issues (1); review and analyze complied OCP records from R. Hixson in order to verify completeness and determine additional pages to produce (.7).
10/24/2017	Kristen C. Rodriguez	0.50			0.50		\$ 355.00	Prepare for and attend call with L. Dahl regarding certification issue.
10/24/2017	Rosanne M. Sangiacomo	0.60			0.60		\$ 252.00	Review and analyze complied OCP records from R. Hixson in order to verify completeness and determine additional pages to produce.
10/25/2017	Keshia W. Lipscomb	1.00					\$ 430.00	Begin review and analysis of patient files for redaction.
10/25/2017	Kristen C. Rodriguez	0.50			0.50		\$ 355.00	Review plaintiff's response to interrogatories (.3); email correspondence with clinicians (.2).
10/25/2017	Rosanne M. Sangiacomo	1.50			1.50		\$ 630.00	Telephone call with L. Dahl and K. Rodriguez re: certification and claims submissions issues (.5); review and analyze complied OCP records from R. Hixson in order to verify completeness and determine additional pages to produce (.5); call with R. Hixson re: OCP supplemental production (.3); attention to discovery issues (.2).
10/25/2017	Mindy A. Marshall	1.50					\$ 472.50	Process Planned Parenthood documents for production; meet with R. Sangiacomo re same; coordinate upload of documents to Relativity database.

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10/25/2017	Ryan Aldrich	0.30					\$ 84.00	Assess, organize, and prepare data set for processing; Transmit data; Draft and transmit processing specifications/statement of work for same.
10/26/2017	Rupert Ellison, Jr.	0.50					\$ 140.00	Review and assess processed data set to ensure conformity with established specifications; Perform data validation steps and document all relevant details; Update review database with tracking information.
10/26/2017	Mindy A. Marshall	2.50					\$ 787.50	Process and redact Planned Parenthood documents for production; meet with R. Sangiacomo re same; coordinate upload of documents to Relativity database.
10/26/2017	Tracy R. Myrick	0.50					\$ 82.50	Work with data set to import into review database according to established specifications; Update search indexes as necessary and appropriate; Perform data validation steps and document all relevant details.
10/26/2017	Ryan Aldrich	0.60					\$ 168.00	Assess, organize, and prepare data for load into review database; Draft and transmit specifications for same. .3 Finalize quality control process for new data set prior to releasing to case team; Draft and circulate status update and details for deliverable. .3
10/27/2017	Kristen C. Rodriguez	2.50			2.50		\$ 1,775.00	Prepare for and attend calls with clinicians (1); review and analyze letter regarding certification (1); review and analyze prior email correspondence on productions (.5).
10/27/2017	Rosanne M. Sangiacomo	3.70			3.70		\$ 1,554.00	Conference with M. Marshall re: pages to prepare for production (.7); review supplemental OCP pages for production (.8); prepare amended discovery responses on OCP issue and circulate to group for review and comment (.7); phone calls with A. Rozeboom and R. Trecker re: certification issue (.8); conference with K. Rodriguez re: strategy for same (.7).
10/27/2017	Tony K. Lu	0.20			0.20		\$ 71.00	Review and comment on second supplemental responses to request for production.
10/27/2017	Ryan Aldrich	0.20					\$ 56.00	Finalize quality control process for new data set prior to releasing to case team; Update review database with tracking information; Draft and circulate status update and details for deliverable.
10/27/2017	Mindy A. Marshall	0.50					\$ 157.50	Process and redact Planned Parenthood documents for production.
10/30/2017	Kristen C. Rodriguez	1.50			1.50		\$ 1,065.00	Review draft supplemental responses to document requests (.5); attend team meeting (.5); research regarding certification issue (.5).
10/30/2017	Ryan Aldrich	0.50					\$ 140.00	Prepare documents for production to opposing counsel, per R. Sangiacomo's request.
10/30/2017	Rosanne M. Sangiacomo	2.40			2.40		\$ 1,008.00	Weekly team strategy call (.6); prepare to do list for same (.6); emails with PPH contacts including M. Falkstrom and J. Warren-Ulrick (.6); finalize production and amended discovery responses on OCP issue and send to opposing counsel (.6).
10/30/2017	Tony K. Lu	1.20			1.10		\$ 426.00	Meet and confer with Kristen Rodriguez and Rosanne Sangiacomo re: weekly conference (1); email communication with Sue Haskell re: followup conference (.1)
10/31/2017	Keshia W. Lipscomb	2.50					\$ 1,075.00	Review and analyze 8th Circuit authority regarding necessary showing for fraudulent certification element of FCA claim.
10/31/2017	Kristen C. Rodriguez	2.50		2.00	0.50		\$ 1,775.00	Research regarding coding (2); draft certification interrogatory response (.5).
10/31/2017	Rosanne M. Sangiacomo	0.50			0.50		\$ 210.00	Attention to issues concerning discovery and certification investigation (.1); emails with J. Warren-Ulrick (.2); emails with K. Tupper scheduling call (.2).
10/31/2017	Tony K. Lu	0.10			0.10		\$ 35.50	Attention to supplemental responses to interrogatories and email communication with K. Rodriguez re: same (.1)
11/1/2017	Keshia W. Lipscomb	1.00					\$ 430.00	Continue to review and analyze federal authority regarding necessary showing for fraudulent concealment element of FCA claim
11/1/2017	Kristen C. Rodriguez	3.50		2.00	1.50		\$ 2,485.00	Call with S. Haskell (.5); Review research regarding express and implied certification (2); Call with current staff member re: electronic billing to Medicaid (1).

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11/1/2017	Rosanne M. Sangiacomo	2.10			2.10		\$ 882.00	Telephone calls with S. Haskell, J. Warren-Ulrich and K. Tupper (1.1); conference with K. Rodriguez re: same (1).
11/1/2017	Tony K. Lu	1.70			1.70		\$ 603.50	Teleconference with Dentons team and Sue Haskell and Jennifer Warren Ulrick (.5); Review and search for specific emails in Relativity for CMS 1500 forms (1.2)
11/2/2017	Keshia W. Lipscomb	2.50					\$ 1,075.00	Additional review and analysis regarding express certification theory for FCA claim.
11/2/2017	Kristen C. Rodriguez	4.20			4.20		\$ 2,982.00	Draft and finalize supplement to interrogatories (2) and document requests re: certification issue (2.2).
11/2/2017	Rosanne M. Sangiacomo	2.20			2.20		\$ 924.00	Conference with K. Rodriguez re: supplemental interrogatory and document responses (1); review and edit discovery responses (1); analyze billing data spreadsheet (.2).
11/2/2017	Tony K. Lu	0.40			0.40		\$ 142.00	Review and comment on supplemental interrogatories and responses to request for production.
11/3/2017	Kristen C. Rodriguez	0.50			0.50		\$ 355.00	Finalize supplement to interrogatories and document requests re: certification issue (.3), including correspondence regarding same (.2).
11/3/2017	Rosanne M. Sangiacomo	1.60			1.60		\$ 672.00	Finalize and serve supplemental interrogatory and document responses re: certification issue (.8); review draft 30(b)(6) notice from R. Hixson (.4); telephone conference with D. Larson re: provider information (.4)
11/3/2017	Tony K. Lu	0.70			0.70		\$ 248.50	Review and comment on drafts of second supplemental responses to interrogatories and requests for production.
11/3/2017	Ryan Aldrich	0.40					\$ 112.00	Prepare documents for production to opposing counsel, per R. Sangiacomo's request.
11/6/2017	Kristen C. Rodriguez	1.00			1.00		\$ 710.00	Lead team call on outstanding discovery issues.
11/6/2017	Rosanne M. Sangiacomo	1.30			1.30		\$ 546.00	Update and circulate action items task list (.3); weekly team call and meeting (1).
11/6/2017	Tony K. Lu	1.40			1.40		\$ 497.00	Review draft response to request for admission (.2) Participate in weekly teleconference with Kristen Rodriguez and Rosanne Sangiacomo re: update to discovery and summary judgment and draft notice of deposition re: Sue Thayer (1.2)
11/7/2017	Rosanne M. Sangiacomo	0.70			0.70		\$ 294.00	Prepare letter to R. Hixson re: identification of abortion services challenged (.4); attention to discovery issues (.3).
11/8/2017	Rosanne M. Sangiacomo	1.50			1.50		\$ 630.00	Prepare letter to R. Hixson re: identification of abortion services challenged (.4); attention to discovery issues (.4); conference with K. Rodriguez re: discovery issues (.4); call with K. Liscomb re: review of abortion patient files (.3).
11/10/2017	Kristen C. Rodriguez	2.00			2.00		\$ 1,420.00	Edit letter to plaintiff's counsel regarding identification of fraudulent claims and deposition notice of plaintiff (1); correspondence regarding same (1)..
11/10/2017	Rosanne M. Sangiacomo	0.90			0.90		\$ 378.00	Revise letter to R. Hixson re: identification of challenged abortion services (.3); revise S. Thayer deposition notice (.3); Serve letter and notice on plaintiff's counsel (.3).
11/12/2017	Keshia W. Lipscomb	3.50					\$ 1,505.00	Continue review and analysis of patient files for production with focus on redacting personal and private information.
11/13/2017	Kristen C. Rodriguez	1.50			1.50		\$ 1,065.00	Lead team meeting (1); attention to correspondence and subpoena to Iowa Medicaid (.5).
11/13/2017	Rosanne M. Sangiacomo	3.50			3.20		\$ 1,470.00	Prepare updated agenda for weekly call (.3); participate in weekly team call (1); draft responses to requests for admission (.2); review email and letter correspondence re: plaintiff's subpoena to Medicaid (.3); telephone call with R. Hixson re: Medicaid subpoena (.7); investigate Medicaid coverage ID issue (1).
11/13/2017	Tony K. Lu	1.30			1.30		\$ 461.50	Participate in weekly teleconference with Kristen Rodriguez and Rosanne Sangiacomo re: Medicaid subpoena (1) and email Mike Falkstrom (.3).
11/14/2017	Rosanne M. Sangiacomo	1.70			1.70		\$ 714.00	Call with D. Larson re: further investigation into Medicaid Coverage ID issue in order to respond to R. Hixson (.5); emails with R. Hixson re: Medicaid coverage ID and subpoena (.4); emails with Iowa AG (.4); confer with K. Rodriguez re: Medicaid subpoena (.4).

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11/15/2017	Keshia W. Lipscomb	4.00					\$ 1,720.00	Continue review and analysis of patient files for production with focus on redacting personal and private information.
11/15/2017	Kristen C. Rodriguez	1.10			1.10		\$ 781.00	Call with client (.3); Call with IME attorney regarding subpoena (.4); Preparation for same (.4).
11/15/2017	Rosanne M. Sangiacomo	4.80			4.80		\$ 2,016.00	Research and analyze objections and responses to requests for admission in 8th Circuit (1.2); confer with K. Rodriguez re: strategy for response to Iowa AG re: Medicaid subpoena (1.2); call with K. Rodriguez and IA AG M. Gillespie re: Medicaid subpoena (1.2); draft responses to RFAs (1.2).
11/15/2017	Tony K. Lu	0.50			0.50		\$ 177.50	Participate in teleconference with Mike Falkstrom, Kristen Rodriguez, and Rosanne Sangiacomo re: 30(b)(6) notice.
11/16/2017	Keshia W. Lipscomb	2.20					\$ 946.00	Continue review and analysis of patient files for production with focus on redacting personal and private information.
11/16/2017	Rosanne M. Sangiacomo	1.80			1.80		\$ 756.00	Draft RFA responses (.6); attention to Iowa Medicaid subpoena issues (.6); emails with K. Liscomb re: review of abortion patient files (.6).
11/17/2017	Rosanne M. Sangiacomo	1.80			1.80		\$ 756.00	Draft follow up email to R. Hixson re: Medicaid subpoena and proposal for handling (.6); emails with R. Hixson and M. Gillespie of IA AG re: same (.6); review and analyze finalized 30(b)(6) deposition notice and compare against draft notice (.6).
11/19/2017	Rosanne M. Sangiacomo	3.00			3.00		\$ 1,260.00	Review and prepare abortion patient files for production.
11/20/2017	Rosanne M. Sangiacomo	3.10			3.10		\$ 1,302.00	Review, redact and prepare abortion patient files for production (.6); emails with R. Aldrich re: production instructions (.7); prepare cover letter for production (.6); finalize and send out production of abortion patient files (.6); email J. Warren-Ulrich (.6).
11/20/2017	Tony K. Lu	3.20			3.20		\$ 1,136.00	Draft response to 30(b)(6) deposition notice.
11/20/2017	Ryan Aldrich	0.60					\$ 168.00	Prepare Abortion Services Sampling PHR documents for production to opposing counsel, per R. Sangiacomo's request.
11/20/2017	Ryan Aldrich	0.60					\$ 168.00	Dentons US LLP (GC-JAKT) Finalize quality control process for new data set prior to releasing to case team; Draft and circulate status update and details for deliverable. .4 Perform searches to isolate additional documents for B. Zahner's review. .2
11/21/2017	Rosanne M. Sangiacomo	0.20			0.20		\$ 84.00	Attention to discovery issues.
11/22/2017	Rosanne M. Sangiacomo	0.20			0.20		\$ 84.00	Attention to discovery issues.
11/26/2017	Kristen C. Rodriguez	5.00		2.00	3.00		\$ 3,550.00	Review plaintiff's supplemental interrogatory responses (2); revise responses to RFAs (1); research for summary judgment and draft OCP outline (2).
11/27/2017	Robert E. Richards	0.30					\$ 232.50	Review email and reply to Kirsten Rodriguez.
11/27/2017	Stephen L. Hill, Jr.	2.00					\$ 1,160.00	Teleconference with Ms. Rodriguez; review of appellate decision; collection of precedents to be used to respond to complaint.
11/27/2017	Alan S. Gilbert	0.50					\$ 497.50	Conference with K. Rodriguez regarding effect of possible combination on case and strategic issues.
11/27/2017	Kristen C. Rodriguez	6.80		2.50	4.30		\$ 4,828.00	Research regarding applicable statutes for OCP claim (2.5); Revise RFAs (1.5); Analysis regarding FCA impact on merger issues (.9); Review production (.5); Review production and research regarding search protocols (1.1); Correspondence regarding 30b6 deposition issues (.3).
11/27/2017	Rosanne M. Sangiacomo	4.40			4.40		\$ 1,848.00	Meet with K. Rodriguez to discuss revisions to RFAs (1.1); review and finalize second half of abortion patient files for production (1.1); emails with J. Warren-Ulrich (1.1); revise RFAs; attention to discovery issues (1.1).
11/27/2017	Ryan Aldrich	0.30					\$ 84.00	Prepare documents for production to opposing counsel, per T. Lu's request.
11/27/2017	Tony K. Lu	2.20			2.20		\$ 781.00	Continue draft of response to 30(b)(6) deposition notice and attention to bates label of documents (.8); Attention to preparation and service of supplemental production and internal email communications re: same (1); Email communications to Sue Haskell and Jennifer Warren Ulrich re: deposition (.4)
11/28/2017	Kristen C. Rodriguez	0.50			0.50		\$ 355.00	Correspondence with client.

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Date	Name / Invoice Number	Hours	Plds, Mtn, Brief	Research	Investigation	Interviewing	Amount	Description
11/28/2017	Rosanne M. Sangiacomo	3.30			3.30		\$ 1,386.00	Finalize production of second portion of patient files (1.1); emails with litigation support re: same (1.1); revise RFAs (1.1).
11/28/2017	Tony K. Lu	0.30			0.30		\$ 106.50	Attention to and draft email communication to Sue Haskell re: 30(b)(6) witness testimony.
11/28/2017	Ryan Aldrich	0.50					\$ 140.00	Prepare documents for production to opposing counsel, per R. Sangiacomo's request.
11/29/2017	Kristen C. Rodriguez	3.10			3.10		\$ 2,201.00	Review and edit RFAs (.8); correspondence with client (.8); internal analysis regarding same (1); compile materials for S. Hill (.5).
11/29/2017	Robert E. Richards	0.30					\$ 232.50	Emails and call re successor liability and related analysis
11/29/2017	Rosanne M. Sangiacomo	1.60			1.60		\$ 672.00	Attention to discovery issues (.5); multiple conference with K. Rodriguez re: strategy issues (.5); review key file materials to go to S.Hill for his review (.4); email communications with client (.2).
11/29/2017	Geoffrey M. Miller	0.40					\$ 182.00	Call with K. Rodriguez re successor liability and fraudulent transfer liability.
11/29/2017	Tony K. Lu	1.00			1.00		\$ 355.00	Attention to compilation of relevant materials for partner review.
11/30/2017	Kristen C. Rodriguez	1.10			1.10		\$ 781.00	Analysis of remaining discovery period and witnesses needed.
11/30/2017	Rosanne M. Sangiacomo	3.30			3.30		\$ 1,386.00	Draft email to R. Hixson re: deposition scheduling and corporate designees (.6); compare plaintiff's chart in RFAs against billing data for verification purposes (.6); emails with local counsel S. Thompson re: verification responses (.5); conference with K. Rodriguez re: strategy (1); revise RFA (.6).
12/1/2017	Kristen C. Rodriguez	1.00			1.00		\$ 710.00	Edits to responses to RFAs.
12/1/2017	Ryan Aldrich	0.80					\$ 224.00	Prepare updated document productions prior to transfer to opposing counsel, per R. Sangiacomo's request.
12/1/2017	Rosanne M. Sangiacomo	2.40			2.40		\$ 1,008.00	Finalize production of abortion files (.5); prepare cover letter (.4); produce abortion files (.5); conference with K. Rodriguez re: discovery matters (.4); revise cover letter (.6)..
12/1/2017	Tony K. Lu	1.10			1.10		\$ 390.50	Start legal research and review of case law on issue of successor liability under FCA.
12/3/2017	Rosanne M. Sangiacomo	1.00			1.00		\$ 420.00	Review and analyze Plaintiff's supplemental interrogatory responses.
12/4/2017	Kristen C. Rodriguez	5.00		3.00	2.00		\$ 3,550.00	Attend team meeting (1); research and strategy for summary judgment (3); Merger analysis (1).
12/4/2017	Rosanne M. Sangiacomo	2.40			2.40		\$ 1,008.00	Review and analyze supplemental interrogatory responses (1); weekly team meeting (1); attention to discovery issues (.4).
12/4/2017	Tony K. Lu	3.10		2.00	2.10		\$ 1,100.50	Continue legal research and writing memo re: successor liability and FCA (2); Teleconference with Kristen Rodriguez and Rosanne Sangiacomo re: strategy and discovery coordination (1.1)
12/5/2017	Kristen C. Rodriguez	11.40		5.00			\$ 8,094.00	Analysis of summary judgment and expert issues with A. Gilbert (1.6); Draft correspondence to opposing counsel (1.6); Call with client (1.6); Edit deposition notice topic objections (1.6); Prepare for court status conference (1.6); Research regarding FCA issues for summary judgment (3.4)
12/5/2017	Rosanne M. Sangiacomo	2.50			2.50		\$ 1,050.00	Attention to discovery issues and prepare for status hearing.
12/5/2017	Alan S. Gilbert	1.00					\$ 995.00	Conference with K. Rodriguez regarding strategy and combination issues.
12/5/2017	Tony K. Lu	2.00			2.00		\$ 710.00	Attention to Planned Parenthood organization of relevant vital documents (.6) teleconference with Marjorie Easter and Kristen Rodriguez (.6); Write memo note re: talk with Easter (.2); Prepare for and call Sue Haskell and Paula Laube re: deposition (.6)
12/5/2017	Tony K. Lu	1.10			1.10		\$ 390.50	Continue legal research and review of case law concerning successor liability (1.1)
12/5/2017	Geoffrey M. Miller	0.20					\$ 91.00	Call with K. Rodriguez re merger/consolidation issues.
12/6/2017	Alan S. Gilbert	0.20					\$ 199.00	Conference with K. Rodriguez regarding strategy.
12/6/2017	Ryan Aldrich	0.50					\$ 140.00	JAKT Prepare documents for production to opposing counsel, per B. Zahner's request.
12/6/2017	Kristen C. Rodriguez	5.50	5.00		0.50		\$ 3,905.00	Prepare for and attend court hearing (3); Summary judgment analysis (2); correspondence regarding deposition dates (.5)

Date	Name / Invoice Number	Hours	Plds, Mtn, Brief	Research	Investigation	Interviewing	Amount	Description
12/6/2017	Rosanne M. Sangiacomo	3.10			3.10		\$ 1,302.00	Prepare for and participate in telephonic status hearing (1.6); conference with K. Rodriguez re: next steps (1.5).
12/7/2017	Kristen C. Rodriguez	0.70			0.70		\$ 497.00	Calls with team regarding discovery and analysis issues.
12/7/2017	Rosanne M. Sangiacomo	0.30			0.30		\$ 126.00	Attention to discovery issues.
12/7/2017	Tony K. Lu	4.20	4.20				\$ 1,491.00	Review comments on response to 30(b)(6) deposition notice and revise draft re: same (3.9); Teleconference with Kristen Rodriguez re: same (.3).
12/8/2017	Kristen C. Rodriguez	1.00	1.00				\$ 710.00	Thayer: Summary judgment analysis.
12/8/2017	Rosanne M. Sangiacomo	0.60			0.60		\$ 252.00	Attention to discovery issues.
12/8/2017	Tony K. Lu	1.50			1.50		\$ 532.50	Telephone with Sue Haskell re: Depositions (.3); Telephone with Paula Laube re: depositions (.3); Compile and start review of documents in preparation for team conference related to OCP issue (.9).
12/10/2017	Keshia W. Lipscomb	1.40					\$ 602.00	Review and analyze federal authority regarding whether violation of internal guideline or policy, such as standing order, can be a violation of the False Claims Act.
12/10/2017	Keshia W. Lipscomb	4.20					\$ 1,806.00	Review and analyze federal cases to determine specific types of evidence looked to by courts in determining whether violation of law is material as necessary under False Claims Act.
12/10/2017	Keshia W. Lipscomb	1.50					\$ 645.00	Draft brief summary regarding evidence of materiality and reliance on internal guideline as relevant to False Claims Act.
12/10/2017	Kristen C. Rodriguez	2.00	2.00				\$ 1,420.00	Thayer: Summary judgment analysis (1); review materiality and internal guideline research (1).
12/10/2017	Tony K. Lu	1.60			1.60		\$ 568.00	Start review of Plaintiffs' Supp. Answers to Interrogatories and prepare outline of discussion with Sue Haskell (1.6).
12/11/2017	Kristen C. Rodriguez	7.60	4.00		1.60	2.00	\$ 5,396.00	Review discovery materials (.6); draft summary judgment outline (4); team meeting regarding task list and discovery issues (1); interviews with fact witnesses (2).
12/11/2017	Rosanne M. Sangiacomo	4.50			4.50		\$ 1,890.00	Weekly team call and meeting (1); analyze supplemental interrogatory responses (2.5); call with S. Haskell (1).
12/11/2017	Tony K. Lu	7.70	1.50		6.20		\$ 2,733.50	Continue draft of outline for Sue Haskell teleconference (2.4); Review documents in preparation for meeting with team(1.3); teleconference with team concerning supplemental interrogatories (1.5); teleconference with Sue Haskell re: supplemental interrogatories and revise notes re: same (1); Revise draft of objections to 30(b)(6) notice (1.5)
12/12/2017	Kristen C. Rodriguez	2.00			2.00		\$ 1,420.00	Prepare for meeting with S. Hill.
12/12/2017	Rosanne M. Sangiacomo	0.20			0.20		\$ 84.00	Attention to discovery issues.
12/12/2017	Tony K. Lu	4.00	3.70				\$ 1,420.00	Start review and analysis of documents and relevant legal case law to prepare outline for discussion with FCA partner (2); Start draft of outline for discussion re: FCA claims (1.7); Telephone with Penny Dickey (.3).
12/13/2017	Stephen L. Hill, Jr.	1.00					\$ 580.00	Review of pleadings.
12/13/2017	Keshia W. Lipscomb	1.00					\$ 430.00	Review and analyze federal authority regarding whether showing of materiality is required under the False Claims Act even prior to amendments, as relevant to current case facts.
12/13/2017	Keshia W. Lipscomb	1.00					\$ 430.00	Review and analyze Iowa case law to evaluate whether violation of internal practice or standing order can constitute medical malpractice or medical negligence.
12/13/2017	Keshia W. Lipscomb	1.20					\$ 516.00	Review and analyze state authority across jurisdictions to identify cases discussing violation of internal practice or standing order as instance of medical malpractice or medical negligence.
12/13/2017	Kristen C. Rodriguez	4.60	2.00	2.00	0.60		\$ 3,266.00	Correspondence with fact witness (.6); Review legislative history (2); work on summary judgment outline (2).
12/13/2017	Rosanne M. Sangiacomo	1.30			1.30		\$ 546.00	Attention to discovery issues and factual investigation re: OCP and standing order issues.
12/13/2017	Tony K. Lu	5.10				5.10	\$ 1,810.50	Continue draft of outline for Steve Hill discussion (2.3); Draft Outline for telephone discussion with Penny Dickey (2); Teleconference with Kristen Rodriguez to strategize approach to interview of Penny Dickey (.7); Communicate with Penny Dickey re: discussion (.1)

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Date	Name / Invoice Number	Hours	Plds, Mtn, Brief	Research	Investigation	Interviewing	Amount	Description
12/14/2017	Kristen C. Rodriguez	3.50			3.50		\$ 2,485.00	Team call (1); call with database 30b6 witness (.5); call with fact witnesses (.5); Review agenda for S. Hill meeting (.5); Review memo to file from PPH in house counsel (.5); Review FPCI protocols (.5).
12/14/2017	Rosanne M. Sangiacomo	1.70			1.70		\$ 714.00	Attention to discovery issues and factual investigation re: OCP and standing order issues (1); prepare for call with S. Hill (.7).
12/14/2017	Tony K. Lu	2.80			2.80		\$ 994.00	Email communications to arrangement Penny Dickey telephone conference (.1); Plan and prepare for call with team re: discussion with Steve Hill and Penny Dickey (.3); Participate in teleconference with team members related to strategy of discussion (.5); Prepare brief outline for conference with Stephen Hill (.5); Teleconference with Penny Dickey and Kristen Rodriguez (1.5).
12/14/2017	Stephen L. Hill, Jr.	6.00					\$ 3,480.00	Review of pleadings to prepare for call with trial team.
12/15/2017	Stephen L. Hill, Jr.	7.50					\$ 4,350.00	Prep for call with matter team; telephone conference.
12/15/2017	Keshia W. Lipscomb	0.50					\$ 215.00	Review and analyze 8th Circuit jury instructions regarding False Claims Act.
12/15/2017	Keshia W. Lipscomb	2.30					\$ 989.00	Review and analyze False Claims Act case with appeal pending in 11th Circuit, reviewing district court orders, parties' motions and briefs, and all expert reports exchanged.
12/15/2017	Ryan Aldrich	0.40					\$ 112.00	Prepare documents for production to opposing counsel, per R. Sangiacomo's request.
12/15/2017	Kristen C. Rodriguez	4.50			4.50		\$ 3,195.00	Edit correspondence to opposing counsel (2.5); prepare for and attend strategy meeting with S. Hill (1); call with client (1).
12/15/2017	Rosanne M. Sangiacomo	4.50			4.50		\$ 1,890.00	Attention to discovery issues and factual investigation re: OCP and standing order issues (1.5); call with S. Hill re: FCA issues (1.5); conference with K. Rodriguez and A. Gilbert re: action items and case strategy (1.5)
12/15/2017	Tony K. Lu	3.20	2.00		1.20		\$ 1,136.00	Review relevant documents and prepare for meeting with Stephen Hill (1); Attention to review of notes of talk with Marjorie Easter and Dr. Haskell (.2); Participate in teleconference with Stephen Hill and team (2).
12/15/2017	Alan S. Gilbert	2.00					\$ 1,990.00	Meeting regarding case strategy with S. Hill and team,
12/17/2017	Rosanne M. Sangiacomo	0.40			0.40		\$ 168.00	Attention to discovery issues.
12/18/2017	Keshia W. Lipscomb	0.20					\$ 86.00	Review and circulate article regarding False Claims Act and review comments regarding jury instructions.
12/18/2017	Kristen C. Rodriguez	4.10			4.10		\$ 2,911.00	Team meeting (1); edit correspondence with plaintiff's counsel (1.1); review FOIA issues relating to relator materials provided to government (1); Draft email to client (1).
12/18/2017	Rosanne M. Sangiacomo	1.60			1.60		\$ 672.00	Weekly team meeting (1); attention to discovery issues (.1); conference with K. Rodriguez re: same (.2); finalize Iowa Medicaid response (.3).
12/18/2017	Tony K. Lu	1.40			1.00		\$ 497.00	Participate in teleconference call with Rosanne Sangiacomo and Kristen Rodriguez re: planning strategy for depositions (1); Attention to deposition arrangements for Paula Laube, Sue Haskell, Marjorie Easter (.4)
12/19/2017	Kristen C. Rodriguez	4.00			4.00		\$ 2,840.00	Calls with potential experts (.5); conference with R. Sangiacomo regarding transition issues (1); Review production (1); Email correspondence for conflicts purposes with experts (.5); Revise R. 30b6 topic objections (1).
12/19/2017	Rosanne M. Sangiacomo	1.00			1.00		\$ 420.00	Meeting with K. Rodriguez to discuss experts (.5); call with C. Swanson, potential expert (.5).
12/19/2017	Tony K. Lu	0.70			0.70		\$ 248.50	Start draft of supplemental responses to PPH second interrogatories.
12/20/2017	Kristen C. Rodriguez	4.20	2.60		2.00		\$ 2,982.00	Edit correspondence with plaintiff's counsel regarding discovery matters (2); Revise and finalize R. 30b6 topic objections (2.6).

Date	Name / Invoice Number	Hours	Plds, Mtn, Brief	Research	Investigation	Interviewing	Amount	Description
12/20/2017	Tony K. Lu	4.10			2.90		\$ 1,455.50	Continue draft and revision of third supplemental interrogatories including review of medical protocols (1.2); Review emails and Medicaid subpoena and produced documents (.5); Plan and prepare for and telephone with Rosanne Sangiacomo re: abortion-related claims (.5); Draft email to opposing counsel re: deposition and supplemental interrogatories (.5); Telephone with Becky Parrish re: follow-up discovery (.2); Miscellaneous case management and scheduling, including teleconference with Kristen Rodriguez re: course of action (1.2).
12/21/2017	Kristen C. Rodriguez	3.50			3.50		\$ 2,485.00	Call with B. Parrish and FPCI executive director (1); call with client (1); follow up call with T. Lu regarding immediate next steps (.5); Draft correspondence to opposing counsel regarding variety of discovery issues (1).
12/21/2017	Alan S. Gilbert	0.20					\$ 199.00	E-mails with Roger Evans.
12/21/2017	Rosanne M. Sangiacomo	0.50			0.50		\$ 210.00	Call with M. Falkstrom.
12/21/2017	Tony K. Lu	4.30			3.30		\$ 1,526.50	Meet and confer with Kristen Rodriguez re: outline of proposed action for December (.9); Start review and analysis of additional documents produced by Medicaid and FPCI protocol (1); Plan and prepare for call with Becky Parrish and Jodi Tomolonovic (.6); Teleconferences with Becky Parrish, Jodi Tomolonovic and counsel for FPCI (1.2); Participate in teleconference with Mike Falkstrom and Kristen Rodriguez/Rosanne Sangiacomo (.5); Email communication to Jodi Tom. re: scheduling (.1)
12/22/2017	Kristen C. Rodriguez	0.50			0.50		\$ 355.00	Correspondence regarding deposition scheduling.
12/22/2017	Tony K. Lu	0.20	0.20				\$ 71.00	Revise draft of amended notice of deposition and email communication re: same.
12/23/2017	Kristen C. Rodriguez	0.80	0.80				\$ 568.00	Correspondence with T. Lu re analysis of deposition outline for Laube and 30b6.
12/24/2017	Tony K. Lu	1.00			1.00		\$ 355.00	Start review of document production in preparation for Paula Laube deposition.
12/25/2017	Tony K. Lu	2.60			2.60		\$ 923.00	Continue review of document production in preparation for depositions of Paula Laube and Jennifer Warren Ulrich.
12/26/2017	Keshia W. Lipscomb	2.90					\$ 1,247.00	Review and analyze jury instructions across all federal courts for guidance regarding False Claims Act cases, for use in forming summary judgment strategy.
12/26/2017	Keshia W. Lipscomb	2.10					\$ 903.00	Draft Freedom of Information Act request to U.S. Attorney, analyzing request requirements and appropriate agency, in order to seek complaint and other investigative materials filed by relator and documents regarding government's decision not to intervene.
12/26/2017	Kristen C. Rodriguez	2.00	1.00		1.00		\$ 1,420.00	Review and edit FOIA request (1); review jury instructions (1).
12/26/2017	Tony K. Lu	4.20			4.20		\$ 1,491.00	Start draft of deposition prep outline for Paula Laube.
12/27/2017	Kristen C. Rodriguez	1.00	0.70		0.30		\$ 710.00	Review outline for summary judgment (.7); correspondence regarding expert search (.3).
12/27/2017	Tony K. Lu	5.80	5.40		0.40		\$ 2,059.00	Draft and revise outline for 30(b)(6) deposition and compile documents re: same (5.4); Continue draft and revision of outline for Paula Laube deposition and email re: same (.3); Email communication with opposing counsel re: conference (.1)
12/28/2017	Kristen C. Rodriguez	4.20			4.20		\$ 2,982.00	Prepare for attend call with P. Laube (2.2); prepare for and attend call with J. Ulrich-Warren (2).
12/28/2017	Tony K. Lu	4.50			2.00	2.50	\$ 1,597.50	Prepare for and hold teleconference with Kristen Rodriguez and Paula Laube (2.5); Compile and gather documents for Jennifer Warren Ulrich (.2); Teleconference with Jennifer Warren Ulrich and Kristen Rodriguez re: 30(b)(6) depo prep (1.8).
12/29/2017	Kristen C. Rodriguez	2.70	2.00		0.70		\$ 1,917.00	Meet and confer conference with opposing counsel (.4); call with expert recruiter (.3); draft motion for continuance of status hearing and file (2).

Date	Name / Invoice Number	Hours	Plds, Mtn, Brief	Research	Investigation	Interviewing	Amount	Description
12/29/2017	Tony K. Lu	1.00			1.00		\$ 355.00	Participate in meet and confer session with plaintiff's counsel and Kristen Rodriguez re: status conference (.5); Confer and strategize with K. Rodriguez re: approach to preparation for deposition (.4) Review draft motion for status conference (.1)
1/2/2018	Kristen C. Rodriguez	0.4			0.4		286	Attention to correspondence regarding experts (0.2); correspondence with client (0.2)
1/2/2018	Tony K. Lu	0.6			0.6		240	Attention to and email to Jodi Tomolonvic re: set up teleconference (.1); Start preparation of outline of discussion with Jodi Tomolonvic -0.5
1/3/2018	Kristen C. Rodriguez	0.5			0.5		357.5	Various correspondence regarding potential experts.
1/3/2018	Tony K. Lu	2.3			2.3		920	Communications with PPH personnel re: additional email search and start preparation of to-do list and agenda for further investigation (1); Telephone conference with Jodi Tomolonvic re: FPCI investigation (.6); Review expert qualifications and email experts re: coding and billing (.7)
1/4/2018	Tony K. Lu	2.2			2.2		880	Revise draft of supplemental responses to second set of interrogatories (.5); Attention to and review additional expert qualifications and emails re: same (.3); Review MQA Minutes for references to standing order or audit, gather FPCI Protocol documents, and internal email re: same (.6); Start update to outline for 30(b)(6) deposition prep (.8)
1/4/2018	Kristen C. Rodriguez	1			1		715	Correspondence and analysis regarding experts (0.6) and conference with client (0.4)
1/4/2018	Ryan Aldrich	0.4					118	Assess, organize, and prepare data for load into review database; Draft and transmit specifications for same.
1/5/2018	Ryan Aldrich	0.7					206.5	Finalize quality control process for new data set prior to releasing to case team; Update review database with tracking information; Draft and circulate status update and details for deliverable; Correspondence with T. Lu regarding production status of MQA minutes.
1/5/2018	Tony K. Lu	2.7			2.7		1,080.00	Conduct search and analysis of internal correspondence to determine status of abortion-related patient files and email re: same (2); Email communication with AJ Strom re: email search (.3); Internal communications related to deposition scheduling (.2); Email communication with Russ Hixson re: patient files (.2)
1/5/2018	Kristen C. Rodriguez	0.5			0.5		357.5	Attention to correspondence regarding deposition schedule with opposing counsel.
1/5/2018	Rupert Ellison, Jr.	0.5					147.5	Work with data set to import into review database according to established specifications; Update search indexes as necessary and appropriate; Perform data validation steps and document all relevant details.
1/8/2018	Alan S. Gilbert	2.5			2.5		2,687.50	Conferences with K. Rodriguez regarding exposure analysis and overall strategy (0.5); review plaintiff's interrogatory answers describing OCP claims (2.0).
1/8/2018	Tony K. Lu	6.3			6.3		2,520.00	Continue draft and revision of outline for PPH 30b6 deposition preparation (2.5); Review documents to supplement deposition outline (.8); Participate in meet and confer session with K. Rodriguez and opposing counsel re: depositions and internal emails concerning the same (1.3); Update weekly strategy document for next steps (.4); Teleconference with client (.3); Participate in weekly teleconference with K. Rodriguez re: discovery to-do list (1)
1/8/2018	Kristen C. Rodriguez	5.7			5.7		4,075.50	Prepare for and attend meet and confer (1.5); Strategy session with A. Gilbert (0.5); Attend team call (1.0); Work on task list (0.4); Review status of FOIA (0.3); Correspondence regarding liability analysis (0.5); Sue Thayer deposition prep (1.5)
1/9/2018	Kristen C. Rodriguez	5.7	3		2.7		4,075.50	Correspondence regarding liability with client (.2); Analysis of expert issues (1); Conference with A. Gilbert regarding experts and OCP issue (.5); Various correspondence regarding meet and confer with plaintiff's counsel (.5); Review expert discovery schedule (.5); Draft OCP summary judgment outline (3).

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1/9/2018	Tony K. Lu	4.4		1.1	3.3		1,760.00	Review and craft proposed revised discovery schedule (.8); Review documents related to Sue Thayer to supplement 30b6 deposition prep outline (PPH 86-87) (.5); Conduct independent research and email contact to Becky Simer (.6); Review and update master task list (.7); Review and analyze CVs of proposed Medicaid experts and email memo re: same (.7) ; Research, review, and analyze false claim act sources for assistance in case (1.1)
1/9/2018	Alan S. Gilbert	0.5					537.5	Conference with K. Rodriguez regarding strategy.
1/10/2018	Tony K. Lu	3.1			3.1		1,240.00	Review Relativity documents concerning MQA Minutes to ensure accuracy for production (.4); Prepare for and participate in teleconference and interview of Becky Simer and follow-up conference with Kristen Rodriguez re: same (1.5); Teleconference with Plaintiffs' re: scheduling order and followup with K. Rodriguez re: same (.7); Teleconference with K. Rodriguez re: discovery strategy with Becky Simer (.5)
1/10/2018	Tony K. Lu	0.2					80	Revise schedule for expert depositions (.2)
1/10/2018	Kristen C. Rodriguez	6.8			6.8		4,862.00	Draft and edit OCP claim overview (2.8); Call with client (0.4); Work on key documents (0.3); Calls and correspondence regarding audit (0.5); meet and confer with plaintiff's counsel (1.0); Call with Becky Stemer (0.5); Follow up calls with T. Lu regarding same (0.3); Strategy conference with A. Gilbert regarding same (1.0)
1/10/2018	Alan S. Gilbert	3.5			3.5		3,762.50	Review supplemental response to interrogatory re: abortion services claims and review draft outline of OCP claims (1.0); telephone conference with R. Evans (1.5); conferences with K. Rodriguez re: strategy (1.0)
1/11/2018	Kristen C. Rodriguez	1.6			1.6		1,144.00	Calls with potential experts (0.6); Coordinate 30b6 prep (1.0)
1/11/2018	Tony K. Lu	10.2	1.2		9		4,080.00	Teleconference with potential expert Dr. Policar re: potential retention of expert (1.2); Draft and revise motion to revise discovery schedule (1.2); Continue draft and revision of outline for PPH 30(b)(6) deposition outline preparation (7.8)
1/11/2018	Suzanne D. Smith	0.6					198	Review shared drive for production information
1/11/2018	Ryan Aldrich	0.7					206.5	Prepare documents for production to opposing counsel, per T. Lu's request.
1/11/2018	Alan S. Gilbert	1.4			1.4		1,505.00	Review notes of witness interview and resume of potential expert (.4); review recent favorable FCA decision (1.0)
1/12/2018	Tony K. Lu	5.4			5.4		2,160.00	Prepare for and participate in 30(b)(6) deposition preparation of Jennifer Warren Ulrich and follow-up conference with K. Rodriguez re: same (3.9); Review and analyze Sue Thayer Report (.1); Review and analyze supplemental responses to interrogatories related to abortion services (.5); Telephone with potential expert Suzanne Dennis and email update re: same (.7); Update task list (.1); email communication with Becky Simer re: follow up (.1)
1/12/2018	Mary K. Ciziunas	0.3					88.5	Obtain Public records information on Susan Thayer per K. Rodriguez.
1/12/2018	Kristen C. Rodriguez	4.6	1		3.6		3,289.00	Call with potential expert (.5); Prep 30b6 witness (2.6); Edit motion for extension (1); Draft email to client regarding follow ups (.5).
1/12/2018	Keshia W. Lipscomb	1.2					534	Review and analyze transcript of sworn statement by J. Jackson filed with Plaintiff's Motion to Compel.
1/12/2018	Keshia W. Lipscomb	0.4					178	Draft brief summary of sworn statement by J. Jackson, with focus on evaluating need to depose witness.
1/13/2018	Suzanne D. Smith	1.6					528	Review production log, update with missing production information
1/14/2018	Kristen C. Rodriguez	0.3			0.3		214.5	Review 30b6 topic letter from opposing counsel; Draft correspondence to client regarding follow ups.

Date	Name / Invoice Number	Hours	Plds, Mtn, Brief	Research	Investigation	Interviewing	Amount	Description
1/15/2018	Tony K. Lu	4.8			4.8		1,920.00	Review and analyze correspondence from Plaintiff's counsel re: 30(b)(6) deposition and write email memo re: same (1.5); Teleconference with K. Rodriguez and R. Hixson re: deposition dates (2.5); Telephone communications with witnesses re: availability for deposition (.4); Email follow up to AJ Strom re: .pst email search (.1) ; Revise and update weekly agenda (.3)
1/15/2018	Kristen C. Rodriguez	3.1			3.1		2,216.50	Conference with opposing counsel (2.5); Review supplemental interrogatories (0.2); review 30b6 letter (0.2); correspondence regarding deposition timing (0.2).
1/16/2018	Kristen C. Rodriguez	3.7	2		1.7		2,645.50	Draft response to opposing counsel regarding lack of agreement regarding discovery schedule (.5); work on draft of discovery schedule and discussion with A. Gilbert regarding same (.5); Draft and revise agenda for court conference and conference with T. Lu regarding same (.5); Draft motion to extend discovery schedule (2); Correspondence regarding process server (.2).
1/16/2018	Tony K. Lu	7.7	3		4.7		3,080.00	Review counsel email and propose dates for deposition (.5); Teleconference with Paula Laube re: depositions (.1); Draft Motion to File Motion for Leave to File under Seal (.7); Attention to comparison of supplemental interrogatories and perform miscellaneous discovery related matters in connection with forthcoming depositions (.9); Draft and revise proposed joint agenda statement (2.2); Teleconference with K. Rodriguez re: joint motion for discovery extension and depositions (.3) Draft and revise motion to extend discovery schedule and prepare documents for filing and electronically file the same(2); Email communications to Plaintiff's counsel re: discovery matters (.7); Review and analyze Pam Estes Deposition and relevant docket entries (.3)
1/16/2018	Mary K. Ciziunas	0.8					236	Additional Internet research on Susan Thayer per K. Rodriguez.
1/16/2018	Alan S. Gilbert	1.3					1,397.50	Conferences with K. Rodriguez regarding strategy and scheduling.
1/17/2018	Tony K. Lu	1.3			1.3		520	Attention to email and upload of Penny Dickey files from AJ Strom (.1); Email communication with Suzy Smith re: subpoena (.1) ; Review plaintiff's response to motion to seal and protective order and internal emails re: same (.6); Attention to and update shared drive documents (.5)
1/17/2018	Alan S. Gilbert	1.5			1.5		1,612.50	Review new filings (0.4); review summary of plaintiff's OCP claims (0.5); conferences with K. Rodriguez (0.6).
1/17/2018	Suzanne D. Smith	4					1,320.00	Search shared drive to obtain possible exhibits for Named Plaintiff deposition; Update outline re: same
1/17/2018	Kristen C. Rodriguez	4			4		2,860.00	Review response brief to motion to seal, and correspondence regarding same (0.3); Various correspondence and investigation regarding experts (1.4); prepare for court hearing on 1/18 (2.3).
1/17/2018	Keshia W. Lipscomb	2					890	Begin review and analysis of federal authority discussing identification of business's internal communications as confidential during discovery exchange, as relevant to Motion to Compel.
1/18/2018	Keshia W. Lipscomb	1.6					712	Continue review and analysis of federal authority discussing identification of business's internal communications as confidential during discovery exchange, and draft brief summaries regarding findings.
1/18/2018	Suzanne D. Smith	3.9					1,287.00	Search shared drive and FileSite to obtain key documents in order to prepare binder for K. Rodriguez review
1/18/2018	Janice A. Collins	3					885	Perform research to locate an expert reports on or testimony of W. Knau. Research requested by T. Lu.

Date	Name / Invoice Number	Hours	Plds, Mtn, Brief	Research	Investigation	Interviewing	Amount	Description
1/18/2018	Kristen C. Rodriguez	5			5		3,575.00	Prepare for and attend court call (1.7); follow up call with T. Lu regarding various discovery issues (0.6); call with client (0.5); correspondence with opposing counsel (0.3); review motion re: protective order (0.6); direct K. Lipscomb regarding review (0.3); review Medicaid responses (0.5); correspondence and call with opposing counsel (0.4).
1/18/2018	Tony K. Lu	7.1	2.5	0.9	3.7		2,840.00	Participate in joint agenda teleconference with the court (1.2); Attention to research of motion to seal in 8th Circuit (.9); Review additional case files and attention to internal files (.6); Review and analyze opposition to motion for extension (.2); Review and analyze outline of Sue Thayer for deposition and additional relevant materials (.2); Teleconference with K. Rodriguez re: experts and discovery action plan (1.5); Review Plaintiffs' opposition to motion for extension of time (.2); multiple emails to prospective experts and deposition witnesses re: discovery matters (1.3); Start review of expert materials related to Plaintiff's expert Wendy Britton and strategize re: same -0.9
1/18/2018	Ryan Aldrich	0.5					147.5	Correspondence with T. Lu regarding the processing of Penny Dickey e-mail for attorney review.
1/18/2018	Alan S. Gilbert	2.5	2.5				2,687.50	Status call with Magistrate Judge Bremer (1.7); review various pleadings and other documents (0.8).
1/19/2018	Tony K. Lu	2.9			2.9		1,160.00	Participate in teleconference with client (.9); Telephone with Ann Finn as potential expert (1.2); Update Task List and review correspondence from counsel re: confidentiality order (.3); Teleconference with Jodi Tomolovic re: followup call and internal email re: same (.5)
1/19/2018	Kristen C. Rodriguez	1.5			1.5		1,072.50	Call with client.
1/19/2018	Ryan Aldrich	0.4					118	Assess, organize, and prepare data set for processing; Transmit data; Draft and transmit processing specifications/statement of work for same.
1/19/2018	Keshia W. Lipscomb	0.2					89	Initial review of discovery index summarizing documents produced to date, in preparation for addressing dispute regarding Confidential designations.
1/19/2018	Keshia W. Lipscomb	0.3					133.5	Initial review of production index and documents produced to date, in preparation for addressing discovery dispute regarding designation of "confidential" documents.
1/19/2018	Alan S. Gilbert	1			1		1,075.00	Telephone conference with client.
1/19/2018	Alan S. Gilbert	0.1			0.1		107.5	Review e-mail regarding potential experts.
1/21/2018	Tony K. Lu	0.5			0.5		200	Continue preparation and outline of 30(b)(6) deposition for PPH (.5)
1/21/2018	Keshia W. Lipscomb	0.5					222.5	Review and analyze correspondence from J.R. Hixson regarding documents marked as confidential.
1/21/2018	Keshia W. Lipscomb	0.8					356	Draft response letter to J.R. Hixson regarding documents marked as confidential.
1/21/2018	Tracy R. Myrick	1					175	Review and assess processed data set to ensure conformity with established specifications; perform data validation steps and document all relevant details; update review database with tracking information.
1/22/2018	Suzanne D. Smith	3.1					1,023.00	Prepare Key Document binder for K. Rodriguez review
1/22/2018	Tony K. Lu	6.8			6.8		2,720.00	Continue draft and revision of outline for 30(b)(6) deposition preparation (3.6); Teleconference with Kristen Rodriguez re: weekly teleconference (1); Email various witnesses re: investigation and update agenda to reflect changes (1.8); Conduct spot-check of Relativity documents based on proposed search terms (.4)
1/22/2018	Ryan Aldrich	0.6					177	Finalize quality control process for Penny Dickey E-mail prior to releasing to case team; Draft and circulate status update and details for deliverable.
1/22/2018	Kristen C. Rodriguez	1.3			1.3		929.5	Attend team meeting (1.0); correspondence with plaintiff's counsel (0.2); Follow up with client on various deposition prep issues (0.1).
1/23/2018	Kristen C. Rodriguez	1.4			1.4		1,001.00	Call with T. Lu regarding shared drive and scheduling of witness interviews (0.6); Review. P. Dickey emails (0.3); Review and edit supplemental interrogatory response (0.5).

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Date	Name / Invoice Number	Hours	Plds, Mtn, Brief	Research	Investigation	Interviewing	Amount	Description
1/23/2018	Tony K. Lu	8.1			8.1		3,240.00	Continue draft and revision of outline (6.7); Teleconference with K. Rodriguez re: additional discovery prep materials and client emails re: same (.6); Continue Relativity search of Penny Dickey email documents (.7); Update PPH agenda with additional tasks (.1)
1/23/2018	Ryan Aldrich	0.4					118	Assess, organize, and prepare data set for processing; Transmit data; Draft and transmit processing specifications/statement of work for same.
1/24/2018	Kristen C. Rodriguez	1.3			1.3		929.5	Call to client (0.3); correspondence regarding document index and preparations for 30b6 (0.5); Call with former executive director from other family planning clinic (0.3); Follow up call with T. Lu regarding same (0.2).
1/24/2018	Tony K. Lu	6.8			6.8		2,720.00	Continue draft and revision of outline for 30(b)(6) deposition (3.7); Conduct review and analysis of document subpoenas to Medicaid for purposes of determining status (1.9); Prepare for and participate in teleconference investigation with Dinny Nielsen (1); Meet and confer with K. Rodriguez re: discovery matters (.2)
1/25/2018	Tony K. Lu	5.6			5.6		2,240.00	Attention to travel arrangements for depositions (.4); Revise Amended notice of deposition for Sue Thayer (.2); Continue review of prior correspondence, production, and Iowa Medicaid manuals to ascertain state of FOIA requests (1.8); Draft response to Russ Hixson re: FOIA request and communicate re: same (.5); Emails to DHS re: search for manual (.3); Email Jennifer Warren Ulrick (.2); Internal email communications related to additional documents to produce (.2); Draft and revise additional agenda items for teleconference with Jennifer Warren Ulrick (.2); Revise and gather documents for 30(b)(6) deposition prep binder (1); Teleconference with K. Rodriguez re: prep for deposition (.7); Review and comment on subpoena rider (.1)
1/25/2018	Kristen C. Rodriguez	3.3			3.3		2,359.50	Correspondence regarding audits/CMS forms (0.5); call with J. Bussell (0.4); Draft rider to Estes subpoena (0.6); correspondence regarding logistics (0.2); Correspondence with plaintiff's counsel (0.3); Review agenda for meeting with client (0.6); call with T. Lu regarding 30b6 and logistics (0.7).
1/25/2018	Suzanne D. Smith	1.9					627	Review dep outline, update shared drive with potential exhibits, update index for K. Rodriguez review.
1/26/2018	Kristen C. Rodriguez	5			5		3,575.00	Prepare for 30b6 deposition with witness.
1/26/2018	Ryan Aldrich	0.9					265.5	Prepare documents for production to opposing counsel, per T. Lu's request. .5 Finalize quality control process for new data set prior to releasing to case team; Draft and circulate status update and details for deliverable. .4
1/26/2018	Rupert Ellison, Jr.	0.2					59	Review and assess processed data set to ensure conformity with established specifications; Perform data validation steps and document all relevant details; Update review database with tracking information.
1/26/2018	Janice A. Collins	0.4					118	Performed telephone research with the Iowa State Library to determine the availability of the 2006-2008 Medicaid Provider Manual. Research requested by T. Lu.
1/26/2018	Tony K. Lu	5			5		2,000.00	Email communication with Jennifer Warren Ulrick re: deposition preparation (.1); Internal email to Ryan Aldrich re: production (.2) Participate in teleconference with Jennifer Warren Ulrick (3.2); Teleconference with Kristen Rodriguez re: discovery task list (.8); Revise supplemental interrogatories (.2); Review and analyze Medicaid Provider Manual (.3); Draft letter to opposing counsel and attention to supplemental documents for production (.5)
1/27/2018	Kristen C. Rodriguez	1.3			1.3		929.5	Review and analysis of potential experts.
1/29/2018	Keshia W. Lipscomb	0.5					222.5	Strategy call with K. Rodriguez and T. Lu.

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Date	Name / Invoice Number	Hours	Plds, Mtn, Brief	Research	Investigation	Interviewing	Amount	Description
1/29/2018	Tony K. Lu	4.2			4.2		1,680.00	Update PPH weekly task list (1.5); Participate in weekly teleconference with Keshia Libcomb and Kristen Rodriguez re: discovery (1); Email Angie Axdahl re: interview (.1); Conduct investigation and communicate with Katie Fergus re: expert retention and write email update re: same (.9); Start draft of internal email memo concerning email search assignment (.7)
1/29/2018	Suzanne D. Smith	1.1					363	Edit shared drive to include additional exhibits for Thayer deposition, update index re same
1/29/2018	Kristen C. Rodriguez	2.7			2.7		1,930.50	Edit subpoena rider (0.3); Correspondence regarding experts (0.4); Team meeting (1.0); email with local counsel (0.4); analysis of expert issues (0.6).
1/30/2018	Kristen C. Rodriguez	3.5			3.5		2,502.50	Calls regarding experts (0.2); Review liability analysis (0.8); review documents produced by plaintiffs (1.7); review hard copy index (0.3); conference with A. Gilbert (0.5).
1/30/2018	Alan S. Gilbert	0.5					537.5	Conferences with K. Rodriguez regarding experts and discovery matters.
1/30/2018	Tony K. Lu	2.4			2.4		960	Continue draft and revise internal memo to Keshia Lipscomb re: email search project (.6); Review and analyze portions of client documents (1.3); Attention to and review potential expert materials for Barb Bunge (.2); Teleconference with K. Rodriguez re: expert issues (.3)
1/31/2018	Tony K. Lu	2			2		800	Write internal memo following review of client documents (.8); Telephone voicemail to Katie Fergus re: followup (.1); Review and analyze employee list provided by Jennifer Warren Ulrick (.2); Telephone and email communication with Denny Carney re: audit (.5); Telephone voicemail for Barb Bunge re: expert retention (.2); search for recommendation related to Barbara Pierce (.1); Attention to production issue from Keshia Libscomb re: confidentiality designation (.1)
1/31/2018	Keshia W. Lipscomb	1					445	Begin drafting chart of document productions to analyze "Confidential" designations.
1/31/2018	Keshia W. Lipscomb	3.3					1,468.50	Review and analyze documents produced in discovery, to address dispute regarding Confidential designations.
1/31/2018	Kristen C. Rodriguez	4			4		2,860.00	Prepare for and attend call with client (0.7); prep for Thayer deposition (2.7); attention to various discovery issues (0.6).
2/1/2018	Tony K. Lu	4.3			4.3		1,720.00	Prepare Outline for discussion with Angie Axdahl (.3); Teleconference with Angie Axdahl re: further investigation (.8); Meet and confer with Kristen Rodriguez re: strategy on summary judgment and discovery (.9); Review and analyze correspondence and spreadsheets to determine scope of employment files produced in litigation to respond to plaintiff (1.2); Update Agenda and send various emails re: agenda items (.7); Teleconference with Rosanne Sangiacomo re: employment files (.4)
2/1/2018	Keshia W. Lipscomb	1.7					756.5	Continue drafting chart of document productions to analyze "Confidential" designations.
2/1/2018	Kristen C. Rodriguez	3			3		2,145.00	Prepare for and attend call with client; Review exhibits for Plaintiff's deposition and prepare.
2/1/2018	Suzanne D. Smith	1.1					363	Review additional document in preparation for Thayer deposition; index same for attorney review
2/1/2018	Keshia W. Lipscomb	2.5					1,112.50	Continue review of documents with focus on dispute over "confidential" designations, with focus on Thayer emails produced as PPH0557 to PPH3956.
2/2/2018	Kristen C. Rodriguez	3.5			3.5		2,502.50	Prepare for Thayer deposition (2.9); Calls with Iowa Medicaid counsel regarding FOIA request and subpoena (0.6)

Date	Name / Invoice Number	Hours	Plds, Mtn, Brief	Research	Investigation	Interviewing	Amount	Description
2/2/2018	Tony K. Lu	4.9			4.9		1,960.00	Review emails re: attorney general documents and ARNP manual and draft email to AG re: same (1.5); Review and analyze list of employee files that have been produced and draft response to plaintiff's 1.12.2018 letter re: production (1.6); Telephone with Kristen Rodriguez re: weekly recap (.6); Review spreadsheet from opposing counsel on missing patient information from AG (.2); Review and analyze additional manuals provided by Iowa Medicaid and email re: same (.7); Email correspondence with opposing counsel re: depositions (.1); Email and telephone communication with Penny Dickey (.2)
2/2/2018	Alan S. Gilbert	0.3		0.3			322.5	Review article about possible constitutional challenges to FCA.
2/3/2018	Kristen C. Rodriguez	3.1			3.1		2,216.50	Prepare for Thayer deposition (2.7); Attention to various outstanding discovery issues (0.4).
2/3/2018	Suzanne D. Smith	3					990	Review exhibit list and exhibit file; update with potential Thayer exhibits. Forward to K. Rodriguez for review
2/4/2018	Kristen C. Rodriguez	3			3		2,145.00	Prepare for Thayer deposition.
2/4/2018	Suzanne D. Smith	1.1					363	Prepare exhibits and shared drive for Thayer deposition
2/5/2018	Suzanne D. Smith	7.2					2,376.00	Prepare exhibits for Thayer deposition; Update deposition index. Update shared drive to include additional exhibits
2/5/2018	Kristen C. Rodriguez	6.7			6.7		4,790.50	Prepare for relator deposition and 30b6 deposition.
2/5/2018	Tony K. Lu	9.3			9.3		3,720.00	Review and analyze 3000 pages of Sue Thayer production to supplement forthcoming deposition (3.7); Telephone with Penny Dickey (.3); Review additional Medicaid provider manuals produced by Attorney General office (.8); Update weekly PPH task list of discovery matters (.8); Teleconference with Keshia Libscomb and Kristen Rodriguez re: weekly team meeting (1.1); Email communications with DOAR expert and participate in teleconference re: same (.7); Review deposition subpoena and craft email to Sue Haskell re: deposition and preparation (.3); Update Production index in response to K. Libscomb project (.2); Attention to email to Mike Falkstrom (.3); Write email to Mike Falkstrom (.3); Revise PPH Employment Files and Letter to counsel (.4); Meet and confer with K. Rodriguez re: Thayer deposition (.4)
2/5/2018	Keshia W. Lipscomb	2.6					1,157.00	Detailed review and analysis of PPH557 to PPH1746, drafting more detailed index of documents in Thayer's email production, for use in addressing confidential designation dispute.
2/5/2018	Keshia W. Lipscomb	0.8					356	Draft chart detailing more specific sections of Thayer email document production, for use in responding to opposing counsel.
2/5/2018	Keshia W. Lipscomb	1.5					667.5	Draft response letter to opposing counsel discussing results of additional review focused on designation of confidential documents.
2/5/2018	Keshia W. Lipscomb	0.4					178	Review and analyze recent document productions to analyze grounds for confidentiality of those documents.
2/6/2018	Kristen C. Rodriguez	6.5			6.5		4,647.50	Prepare for relator deposition and 30b6 deposition; attention to various discovery issues.
2/6/2018	Tony K. Lu	8.5		7.5	1		3,400.00	Conduct legal research and review of case law concerning various issues pertaining to FCA, including public disclosure bar and original source exception, for Sue Thayer deposition (4.4); Attention to documents for use with Sue Thayer deposition related to Medicaid (1); Review Medical Protocols and compile documents re: same for Sue Thayer deposition (.7); Teleconference with Kristen Rodriguez re: deposition and compile OCP medical records re: same (1.9); Review answer to complaint (.4); Voicemails to Katie Fergus and Jodi Tomolovic re: expert issues (.1)
2/6/2018	Alan S. Gilbert	0.7					752.5	Conference with K. Rodriguez regarding expert issues.
2/6/2018	Alan S. Gilbert	0.2					215	E-mail regarding staffing.
2/6/2018	Suzanne D. Smith	10					3,300.00	Assist K. Rodriguez in preparation of Thayer deposition; Create witness exhibits and binder for K. Rodriguez

Date	Name / Invoice Number	Hours	Plds, Mtn, Brief	Research	Investigation	Interviewing	Amount	Description
2/7/2018	Tony K. Lu	12.7		0.5	12.2		5,080.00	Prepare documents for travel to Des Moines for deposition of Sue Thayer (1); Continue research on case law related to False Claims Act (.5); Draft proposed questions for Sue Thayer deposition related to her emails (1.1) Travel to Des Moines for deposition through Charlotte and review supplemental interrogatories in transit (snow storm delay) -10.1
2/7/2018	Kristen C. Rodriguez	10			10		7,150.00	Prepare for plaintiff deposition; travel to Des Moines.
2/7/2018	Alan S. Gilbert	1					1,075.00	Conference with K. Rodriguez regarding Thayer deposition.
2/7/2018	T. Carter. White	0.2			0.2		97	Review and analyze case docket.
2/8/2018	T. Carter. White	1.6			1.6		776	Review and analyze third amended complaint and order on motion to dismiss.
2/8/2018	Tony K. Lu	10.2			10.2		4,080.00	Email communications with Ray Jorgensen re: expert retention (.1); Email Sue Haskell re: deposition confirmation (.1); Travel to and from and participate in deposition of plaintiff Sue Thayer (10)
2/8/2018	Kristen C. Rodriguez	9			9		6,435.00	Prepare for and take deposition of plaintiff.
2/8/2018	Suzanne D. Smith	0.5					165	Telephone and follow up on exhibit location for Thayer deposition
2/9/2018	Kristen C. Rodriguez	8.5			8.5		6,077.50	Meeting with client (1.0); prep 30b6 witness (4.5); return travel (3.0).
2/9/2018	T. Carter. White	1.8			1.8		873	Review and analyze order on MTD (1.0); review and analyze discovery responses (0.8).
2/9/2018	Tony K. Lu	11.5			11.5		4,600.00	Participate in meeting with PPH general counsel Mike Falkstrom (1) teleconference with Ray Jorgensen re: potential expert engagement (.5); prepare for and meet with Jennifer Warren Ulrick to prepare 30(b)6 deposition (4.3); email and telephone communications with Paula Laube, Marj Easter, and Jodi Tomlonovic (.5); return travel from Des Moines to Boston (5.1)
2/9/2018	Jae K. Park	1.2			1.2		708	Review and analyze complaint, order on motion to dismiss, and plaintiff's responses to interrogatories.
2/11/2018	Kristen C. Rodriguez	0.3					214.5	Correspondence regarding payment of fact witnesses and related issues.
2/11/2018	Tony K. Lu	0.1			0.1		40	Email communications with Marj Easter and Paula Laube re: depositions (.1)
2/12/2018	Suzanne D. Smith	1.6					528	Update shared drive for further attorney review
2/12/2018	Kristen C. Rodriguez	3.6			3.6		2,574.00	Vetting for expert (0.7); draft expert retention letter (0.8); interview with expert (0.6); correspondence with client (0.5); call with A. Gilbert regarding Thayer deposition (1.0).
2/12/2018	Alan S. Gilbert	1.3			1.3		1,397.50	Conference with K. Rodriguez regarding Thayer deposition, experts and other strategic issues (1.0); review and edit letter to consultant (.3)
2/12/2018	T. Carter. White	0.8			0.8		388	Draft and revise expert retention letter (0.6); review and analyze interrogatory responses setting out Plaintiff's case theories (0.2).
2/12/2018	Khaleedah S. Thomas	0.3		0.3			72	Conduct research on NewsBank to locate any articles on the individual Lissa Singer of Rhode Island. Request submitted by K. Rodriguez.
2/13/2018	Jae K. Park	3.2		1.7			1,888.00	Prepare for and attend telephone conference with litigation team regarding case status, upcoming tasks, and litigation strategy (1.5); research Eighth Circuit cases regarding Rule 30(b)(6) depositions and obligation to prepare witness and impact on attorney-client privilege waiver (1.7)
2/13/2018	Tony K. Lu	3.6			3.6		1,440.00	Participate in teleconference with Marj Easter re: deposition (.9); Telephone and email communication to Dan Larson re: deposition (.1); Telephone voice message for Todd Buchacker re: interview (.1); Email communications with local counsel re: witness fees (.1); Miscellaneous prep work for planned parenthood in preparation for 30(b)(6) deposition (.4); Telephone with Stan Thompson and email to Kristen Rodriguez re: conflict issue (.3); Update weekly task list (.6); Participate in weekly teleconference with team re: updates (1.1)
2/13/2018	Suzanne D. Smith	6.8					2,244.00	Meet with K. Rodriguez regarding sending additional documents to expert; review medical records, culling only OCP records, prepare index for attorney review;

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2/13/2018	Kristen C. Rodriguez	5.1			5.1		3,646.50	30b6 prep (2.3); review OCP records (0.7); compile records to send to expert (0.4); calls with fact witnesses to prep for deposition (0.5); attend team meeting (1.2).
2/13/2018	Douglas T. Malerba	0.5					147.5	Conduct news and internet research on Lissa Singer for Kristen Rodriguez.
2/13/2018	T. Carter. White	4.7			4.7		2,279.50	Review and analyze interrogatory responses setting out Plaintiff's case theories (1.7); conference call with K. Rodriguez etc. regarding case status and task list (1.1); review and analyze key e-mails and Medicaid protocols (1.9).
2/13/2018	Nancy J. Henry	0.4					118	Research regarding 2006-2008 Iowa Medicare Manual for T. Lu
2/14/2018	T. Carter. White	4.8			4.8		2,328.00	Review and analyze P. Dickey emails for relevance ahead of 30b6 deposition.
2/14/2018	Tony K. Lu	1.3			1.3		520	Teleconference with Kristen Rodriguez re: update on 30(b)(6) prep (.5); Write email correspondence to deponent Dan Larson (.3); Attention to discovery correspondence and draft objections to amended 30(b)(6) notice of deposition (.5)
2/14/2018	Tania A. Barrett	0.8					268	Review PPH OCP Records for Expert
2/14/2018	Jae K. Park	3.4		3.4			2,006.00	Continue legal research regarding preparing Rule 30(b)(6) witness and waiver of attorney-client privilege (3.2); conference with Ms. Kristen Rodriguez regarding same (0.2).
2/14/2018	Jae K. Park	1.8			1.8		1,062.00	Review file and key case documents to identify information to provide to L. Singer for analysis.
2/14/2018	Kristen C. Rodriguez	4			4		2,860.00	Work on expert and 30b6 prep issues (3.3); edit letter to opposing counsel regarding production of personnel files (.7).
2/14/2018	Suzanne D. Smith	2.2					726	Prepare individual pdf(s) of additional OCP records for K. Rodriguez review; Update index of records for attorney review; Prepare files for expert.
2/15/2018	Suzanne D. Smith	1.9					627	Prepare index of documents sent to expert; Prepare working file of OCP records
2/15/2018	T. Carter. White	6.8			6.8		3,298.00	Review and analyze key e-mails and Medicaid protocols (3.0); Review and analyze P. Dickey emails for relevance ahead of 30b6 deposition (3.8).
2/15/2018	Kristen C. Rodriguez	6.3			6.3		4,504.50	Correspondence and calls with expert (0.5); onboarding of J. Park (0.3); correspondence and calls with client (0.7); work on letter to opposing counsel regarding personnel files (0.7); edit objections to 30b6 notice (0.6); draft notes to file re: call with M. Easter (0.8); work on gathering documents for expert (0.3); prepare for 30b6 deposition (2.4).
2/15/2018	Jae K. Park	3.2			3.2		1,888.00	Prepare for and attend telephone conference with expert L. Singer (0.6); continue reviewing file and key case documents to identify information to provide to expert for analysis (2.6).
2/15/2018	Tony K. Lu	1.3					520	Review confidentiality order and correspondence related to FOIA request of FPCI review and communication re: same (.7) Review correspondence related to opposing counsel and communication with K. Rodriguez re: employee files (.6)
2/16/2018	Tony K. Lu	0.2			0.2		80	Email communications with counsel re: deposition (.2)
2/16/2018	Kristen C. Rodriguez	8.1			2.6	5.5	5,791.50	Revise objections and designations to 30b6 notice (0.5); draft and revise letter regarding confidentiality designation, including analysis of same (0.6); prep with client (1.5); factual investigation interviews with clinicians (5.5.).
2/16/2018	Ryan Aldrich	0.6					177	Correspondence with C. White regarding client documents requiring attorney review. .2 Perform searches to isolate documents and prepare for K. Rodriguez's review. .4
2/16/2018	T. Carter. White	0.7			0.7		339.5	Compile relevant emails for preparation for 30b6 deposition.
2/16/2018	Suzanne D. Smith	1.6					528	Update OCP spreadsheet to include exhibit page identification
2/18/2018	Kristen C. Rodriguez	3.5			3.5		2,502.50	Prep for 30b6 on technical issues.
2/18/2018	Tony K. Lu	1.9			1.9		760	Draft document of preparation for PPH 30(b)(6) Deposition (1.6); review email correspondence and documents identified as potential new production (.3)
2/18/2018	Suzanne D. Smith	3.3					1,089.00	Assist K. Rodriguez with various preparation for deposition

Time Entry Records in
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Date	Name / Invoice Number	Hours	Plds, Mtn, Brief	Research	Investigation	Interviewing	Amount	Description
2/19/2018	Kristen C. Rodriguez	9			9		6,435.00	Travel and prep 30b6 witnesses.
2/19/2018	T. Carter. White	1.8			1.8		873	Review and analyze protective order (0.3); review analysis of meeting with expert L. Singer (0.2); begin review of S. Thayer emails for confidentiality (0.9); draft letter to opposing counsel regarding 30b6 deposition (0.4).
2/19/2018	Tony K. Lu	2.7			2.7		1,080.00	Prepare engagement letters on behalf of Paula Laube, Marj Easter, and Sue Haskell (1); Prepare rolling discovery production and draft correspondence re: same (1.1); Attention to email communications with witnesses and download and review of attorney general documents (.6)
2/19/2018	Jae K. Park	0.3			0.3		177	Telephone conference with expert L. Singer.
2/19/2018	Ryan Aldrich	0.1			0.1		29.5	Perform searches to isolate production documents for C. White's review.
2/20/2018	Jae K. Park	1			1		590	Extended telephone conference with expert Lissa Singer regarding results of her investigation and research to date.
2/20/2018	T. Carter. White	2.9			2.9		1,406.50	Review and analyze key documents including Medicaid protocols (1.5); review and analyze S. Thayer emails for confidentiality designation (1.4).
2/20/2018	Tony K. Lu	2			2		800	Teleconference with K. Rodriguez re: deposition and attention to employee list, draft and revise letter, service and communication with opposing counsel re: same.
2/20/2018	Kristen C. Rodriguez	8.5			8.5		6,077.50	Defend corporate rep deposition (7.7); prepare for second corporate rep deposition (0.5); prepare correspondence to opposing counsel regarding staffing issues, including conferences with client (0.3).
2/20/2018	Alan S. Gilbert	0.4			0.4		430	Conference with K. Rodriguez regarding depositions.
2/20/2018	Suzanne D. Smith	4.9					1,617.00	Review listings of claim files, cross reference for further production; Update shared drive with key documents and expert materials; Assist with preparing documents for deposition
2/21/2018	Suzanne D. Smith	1.1					363	Update shared drive with expert material; Revise expert index and production index.
2/21/2018	Ryan Aldrich	0.4					118	Assess, organize, and prepare data for load into review database; Draft and transmit specifications for same.
2/21/2018	Tracy R. Myrick	0.4					70	Work with data set to import into review database according to established specifications; update search indexes as necessary and appropriate; perform data validation steps and document all relevant details.
2/21/2018	Kristen C. Rodriguez	12.5			12.5		8,937.50	Prepare for and attend deposition of corporate rep (8.0); return travel (2.3); edit outline for prep of M. Easter (2.2).
2/21/2018	Jae K. Park	0.3			0.3		177	Miscellaneous communications with expert Lissa Singer regarding requests for additional information and practice manuals.
2/21/2018	T. Carter. White	5.3			5.3		2,570.50	Review and analyze key documents including Medicaid protocols, audit results, and key emails (3.5); review and analyze S. Thayer emails for confidentiality designation (1.8).
2/21/2018	Tony K. Lu	1.9			1.9		760	Telephone with Claudia Beckwith and notes re: same re reasonable interpretation defense (.7); Draft and prepare deposition outline for Marj Easter (1.1); Attention to inquiry re: personnel files and deficiency (.1)
2/22/2018	Tony K. Lu	3.5			3.5		1,400.00	Prep for deposition prep for Marj Easter and telephone preparation of Marj Easter for deposition (2); Update weekly task list (.9); Teleconference with K. Rodriguez re: deposition preparation and additional tasks -0.6
2/22/2018	T. Carter. White	2.9			2.9		1,406.50	Review and analyze S. Thayer emails for confidentiality designation.
2/22/2018	Alan S. Gilbert	0.7			0.7		752.5	Conference with K. Rodriguez regarding depositions.
2/22/2018	Suzanne D. Smith	0.6					198	Create hard copy file of documents sent to expert;
2/22/2018	Kristen C. Rodriguez	3.5			3.5		2,502.50	Correspondence with client (0.5); review of rough transcript for 30b6 witness (2.0); correspondence with client (0.3); work on summary judgment outline (.7).

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Date	Name / Invoice Number	Hours	Plds, Mtn, Brief	Research	Investigation	Interviewing	Amount	Description
2/23/2018	Kristen C. Rodriguez	2.7			2.7		1,930.50	Work on summary judgment outline (0.8); review rough draft of transcript (0.6); correspondence regarding Pam Estes subpoena with local counsel and T. Lu (.3); Review and edit Paula Laube prep outline (1.0).
2/23/2018	Ryan Aldrich	0.2					59	Perform searches to isolate documents for C. White's review.
2/23/2018	T. Carter. White	3.8			3.8		1,843.00	Review and analyze S. Thayer emails for confidentiality designation (1.5); edit chart summarizing same (0.3); draft e-mail to K. Rodriguez etc. regarding questionable confidentiality designations (0.5); begin review and analysis of 30b6 deposition transcript (1.5).
2/23/2018	Tony K. Lu	3.9			3.9		1,560.00	Draft deposition prep outline for Paula Laube and prep documents for review (3.6); Email and telephone communications with local and opposing counsel re: logistics (.3)
2/25/2018	T. Carter. White	5.5			5.5		2,667.50	Review and analyze PPH 30b6 and S. Thayer deposition transcripts.
2/26/2018	Ryan Aldrich	0.4					118	Finalize quality control process for new data set prior to releasing to case team; Update review database with tracking information; Draft and circulate status update and details for deliverable.
2/26/2018	T. Carter. White	7.1		4	3.1		3,443.50	Draft letter to opposing counsel regarding document designations (1); quality control review of confidentiality designations (1.6); strategy and action plan call with K. Rodriguez etc. (.5); research public disclosure bar in FCA qui tam actions (3); review and analyze applicable laws and regulations governing Iowa Medicaid reimbursement (1).
2/26/2018	Jae K. Park	1					590	Participate in weekly case status and strategy call.
2/26/2018	Tony K. Lu	11.6			11.6		4,640.00	Update task list for PPH (.4); Air and road travel to Iowa City from Boston for purpose of depositions (8.7); Meet and confer with Paula Laube for purpose of deposition (2.5)
2/26/2018	Alan S. Gilbert	0.4					430	Telephone conference with T. Amlot.
2/26/2018	Kristen C. Rodriguez	5.5	0.5		5		3,932.50	Edit Paula Laube deposition prep (0.9); prepare for and lead team call (1.2); edit summary judgment outline (.5); edit task list (.3); attend Paula Laube deposition preparation and call with T. Lu regarding same (2.5); correspondence with Iowa AG regarding outstanding requests (0.7); conference with S. Smith regarding key documents (0.6).
2/26/2018	Suzanne D. Smith	6.2					2,046.00	Participate in team call; Meet with K. Rodriguez to discuss key documents and issues of case; Begin review of Thayer deposition
2/27/2018	Suzanne D. Smith	4.8					1,584.00	Update key document hard copy binder and index; Review Thayer deposition
2/27/2018	Kristen C. Rodriguez	3			3		2,145.00	Telephonic attendance of Laube deposition and calls with T. Lu regarding same (2.2); edit task list (0.5); attention to correspondence regarding same (0.3).
2/27/2018	T. Carter. White	1.1		0.6	0.5		533.5	Review and analyze Iowa FOIA response to Iowa right to life (0.5); research public disclosure bar on FCA claims (0.6).
2/27/2018	Tony K. Lu	8			8		3,200.00	Meet and confer with Paula Laube and defend deposition of Paula Laube (5.5); Travel to Cedar Falls for purpose of defending Marj Easter deposition (1.5); Teleconference with Stan Thompson re: deposition (.4); email to Mike Falkstrom and Jennifer Warren Ulrick (.6)
2/28/2018	Tony K. Lu	10.6			10.6		4,240.00	Meet and confer with Marj Easter and defend her deposition (3); Travel to Cedar Rapids for flight to Boston (1.2); Write email update to Mike Falkstrom (.3); Travel from Cedar Rapids to Boston (6.1)
2/28/2018	T. Carter. White	3.9			3.9		1,891.50	Review and analyze interrogatory responses with references to applicable law and regulations (0.6); review and revise letter re confidentiality designations in S. Thayer emails (2.3); designate confidential testimony in S. Thayer deposition based on review and analysis of same (0.5); e-mail and call local counsel regarding FOIA response (0.5).
2/28/2018	Alan S. Gilbert	1			1		1,075.00	Conferences with K. Rodriguez regarding depositions and other issues.
2/28/2018	Alan S. Gilbert	0.3			0.3		322.5	Telephone conference with client.

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Date	Name / Invoice Number	Hours	Plds, Mtn, Brief	Research	Investigation	Interviewing	Amount	Description
2/28/2018	Kristen C. Rodriguez	3.8			3.8		2,717.00	Strategy discussion with A. Gilbert (1.0); Attend deposition of M. Easter via telephone (2.3); correspondence and calls regarding same (0.2); edit task list (0.3).
3/1/2018	T. Carter. White	3.8			3.8		1,843.00	Designate sections of S. Thayer brief confidential based on review and analysis of same (0.7); draft e-mail to K. Rodriguez re: same (0.3); review and analyze P. Laube and M. Easter deposition transcripts (2.8).
3/1/2018	Tony K. Lu	1.1			1.1		440	Teleconference with Kathy Mellon re: issues raised by Plaintiff's counsel (.2); Teleconference with Kristen Rodriguez re: issues raised by Plaintiff's counsel (.4); Teleconferences with Stan Thompson re: issues raised by Plaintiff's counsel (.5);
3/1/2018	Kristen C. Rodriguez	1.6			1.6		1,144.00	Edit key documents index (0.2); correspondence regarding Haskell prep session (0.5); Analysis of representation issues raised by opposing counsel (0.9).
3/1/2018	Suzanne D. Smith	6.3					2,079.00	Prepare Thayer abstract
3/1/2018	Jae K. Park	5.3	1.4	3.9			3,127.00	Perform legal research regarding application of privilege over communications between qui tam relator and government (3.9); prepare pro hac vice motion and registration form (1.4).
3/2/2018	Jae K. Park	0.7			0.7		413	Prepare second set of requests for production of documents to Thayer.
3/2/2018	Suzanne D. Smith	4.9					1,617.00	Finalize Thayer deposition abstract; circulate to attorneys for review
3/2/2018	Kristen C. Rodriguez	0.3			0.3		214.5	Correspondence regarding fee schedules for expert.
3/2/2018	T. Carter. White	0.3		0.3			145.5	Review and revise Iowa Open Records Request letter.
3/2/2018	Tony K. Lu	2.1			2.1		840	Attention to HOPE RN Standing Competency Criteria and internal emails re: same (.2); Start draft of deposition prep outline for Sue Haskell (1.9)
3/3/2018	Tony K. Lu	1.6			1.6		640	Start draft of deposition outline for Pam Estes and review documents re: same.
3/4/2018	Tony K. Lu	2.4			2.4		960	Continue draft and revision of deposition prep outline for Sue Haskell (.6); Continue draft and revision of deposition outline for Pam Estes (1.8)
3/4/2018	Kristen C. Rodriguez	0.7			0.7		500.5	Correspondence regarding Thayer email confidentiality (0.2); Sue Haskell and Pam Estes prep (0.5).
3/5/2018	T. Carter. White	5.2		4	1.2		2,522.00	Review and revise letter to opposing counsel regarding S. Thayer email confidentiality (.5); review and analyze case updates (.2); research public disclosure bar on FCA claims (4); team strategy call (.5).
3/5/2018	Jae K. Park	5.9			5.9		3,481.00	Prepare for and hold team telephone conference regarding case status and strategy (1.2); draft email to L. Singer attaching new documents to review and analyze (0.5); review and analyze key case documents (3.8); telephone conference with K. Rodriguez regarding case strategy (0.4).
3/5/2018	Suzanne D. Smith	2.9					957	Prepare attorney binders for Sue Haskell witness prep; Update shared drive re: exhibits
3/5/2018	Suzanne D. Smith	0.6					198	Update index of documents sent to expert; Update share drive re: same
3/5/2018	Suzanne D. Smith	1					330	Participate in team conference call.
3/5/2018	Suzanne D. Smith	2.9					957	Review Key Document index, binders and shared drive. Distribute to attorneys for review.
3/5/2018	Tony K. Lu	7.3			7.3		2,920.00	Continue draft and revision of deposition outline for Pam Estes (3.5); Telephone voicemails for Dinny Nielsen and Claudia Beckwith re: declarations (.1); Compile exhibits for deposition of Sue Haskell (1.1); Participate in weekly teleconference with team (1.1); Review employment file of Pam Estes to identify further information of interest for deposition (.6); Teleconference with K. Rodriguez to discuss depositions (.2); Review and organize exhibits for Pam Estes deposition(.7)
3/5/2018	Kristen C. Rodriguez	4.9			4.9		3,503.50	Prepare for and attend team meeting (1.2); correspondence regarding P. Estes personnel file (.3); Edit P. Estes deposition outline (1.0); Edit and review S. Haskell dep prep outline (1.5); Edit key documents (0.5); Call with J. Park re: experts and review of audit files (0.4).

Date	Name / Invoice Number	Hours	Plds, Mtn, Brief	Research	Investigation	Interviewing	Amount	Description
3/6/2018	Kristen C. Rodriguez	11			11		7,865.00	Travel to Des Moines for depositions, attend dep prep for S. Haskell, prepare for P. Estes deposition (9.5); edit initial disclosures (0.8); review FOIA request (0.4); edit letter to plaintiff's counsel (0.3).
3/6/2018	Ryan Aldrich	0.3					88.5	Prepare documents for production to opposing counsel, per T. Lu's request.
3/6/2018	T. Carter. White	3.8		1.2	2.6		1,843.00	Draft supplements to initial disclosures under Rule 26 (2.1); research original source prong of public disclosure bar (1.2); review and analyze plaintiff's theory regarding liability under HOPE standing order (0.5).
3/6/2018	Suzanne D. Smith	6.7					2,211.00	Prepare witness prep binders and exhibits for Pam Estes. Prepare for shipment to local counsel. Update shared drive to include index and exhibits for Estes; Update Key Document index on shared drive with appropriate documents.
3/6/2018	Tony K. Lu	10.8		0.5	10.3		4,320.00	Travel to Des Moines from Boston for purpose of depositions (5.6); Meet with plan and prepare Sue Haskell for deposition (4.2); Meet and confer with K. Rodriguez re: summary judgment (.3); Attention to production of Pam Estes documents ahead of deposition (.2); review additional case law related to scienter in preparation for Pam Estes deposition (.5)
3/6/2018	Jae K. Park	3.6			3.6		2,124.00	Continue review of key documents and practice manuals to analyze legality of Planned Parenthood procedures (1.6); extended telephone conference with expert Lissa Singer (1.5); revise and supplement Second Request for Documents to Plaintiff (0.5).
3/7/2018	Suzanne D. Smith	2.9					957	Review and update production index. Forward to T. Liu for review. Begin review of P. Laube deposition.
3/7/2018	Kristen C. Rodriguez	10.5			10.5		7,507.50	Attend deposition of S. Haskell (7.8); prepare for deposition of P. Estes (2.1); review initial disclosures (0.3); review document requests (0.3).
3/7/2018	T. Carter. White	3.2			3.2		1,552.00	Review and revise Iowa open records request to narrow it (0.5); draft second set of interrogatories requesting information on when Ms. Thayer provided information to government (2.2); review K. Nixon documents for potential production (0.5).
3/7/2018	Tony K. Lu	12.6			12.6		5,040.00	Travel to and from and participate in defense of Sue Haskell deposition; Email communications with Paula Laube and court reporter re: depositions; Plan and prepare to take deposition of Pam Estes; Meet and confer with Kristen Rodriguez to plan for deposition of Pam Estes (12.6)
3/7/2018	Jae K. Park	2.8			2.8		1,652.00	Prepare memorandum summarizing discussion with expert L. Singer.
3/8/2018	Jae K. Park	0.2					118	Revise and supplement motion for admission pro hac vice to comply with updated Southern District of Iowa Local Rules.
3/8/2018	Ryan Aldrich	0.3					88.5	Prepare documents for production, per C. White's request.
3/8/2018	T. Carter. White	4.8			4.5		2,328.00	Draft letter to opposing counsel enclosing supplemental production of personnel files (0.4); revise pro hac papers and send to local counsel (0.3); review P. Laube deposition and designate confidential portions pursuant to protective order (1.9); finalize and make production of K. Nixon personnel files, including letter accompanying production (1.0); review and analyze summary of our expert's opinions (0.5); review and analyze relevant Iowa and Medicaid protocols (0.7).
3/8/2018	Tony K. Lu	14			14		5,600.00	Plan and prepare for deposition of Pam Estes (1.5); Travel to West Des Moines and take deposition of Pam Estes (7); Travel from West Des Moines to airport and Boston (5.5)
3/8/2018	Suzanne D. Smith	5					1,650.00	Review Laube deposition, prepare abstract.
3/8/2018	Suzanne D. Smith	0.3					99	Prepare document for production.
3/8/2018	Kristen C. Rodriguez	12			12		8,580.00	Attend deposition of Pam Estes (7.2); edit correspondence to opposing counsel regarding personnel files (0.3); return travel from Des Moines (4.5).

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Date	Name / Invoice Number	Hours	Plds, Mtn, Brief	Research	Investigation	Interviewing	Amount	Description
3/9/2018	Kristen C. Rodriguez	4.6			4.6		3,289.00	Attention to correspondence from opposing counsel(1.0); strategy discussion with A. Gilbert (0.5); strategy, investigation, and analysis regarding audit/public disclosure defense and summary judgment (2.5); edit document requests and interrogatories (0.6).
3/9/2018	T. Carter. White	5		4	1		2,425.00	Research public disclosure bar (2.7); finalize and send letter regarding confidential designations for S. Thayer email accounts (0.3); call with K. Rodriguez regarding FOIA follow up, confidentiality designations, and case strategy (0.2); review and analyze key medical protocols and laws (0.5); draft summary of public disclosure bar and original source (1.3).
3/9/2018	Suzanne D. Smith	2.6					858	Review production document; Finalize Laube abstract.
3/9/2018	Tony K. Lu	1.8			1.8		720	Review PPFA Protocol (.3); Review and compare chart of relevant personnel at PPH for production (.5); Teleconference with Kristen Rodriguez re: outstanding discovery issues (.2); email to opposing counsel and draft correspondence to same re: discovery matters (0.8)
3/9/2018	Ryan Aldrich	0.2					59	Prepare documents for production to opposing counsel, per S. Smith's request.
3/9/2018	Alan S. Gilbert	0.5			0.5		537.5	Review and edit draft discovery requests.
3/9/2018	Alan S. Gilbert	1.5					1,612.50	Conferences K. Rodriguez regarding various discovery and strategic issues.
3/9/2018	Jae K. Park	0.5			0.5		295	Research archived and prior versions of Iowa Administrative Code section 481-51.14.
3/10/2018	Jae K. Park	0.5			0.5		295	Email conference with team regarding exhibit collection for motion for summary judgment and second set of requests for production of documents to plaintiff.
3/10/2018	T. Carter. White	0.8			0.8		388	Review and revise interrogatories based on comments from K. Rodriguez.
3/10/2018	Suzanne D. Smith	0.6					198	Update deposition files on shared drive to include transcripts and exhibits from recent deposition.
3/11/2018	Kristen C. Rodriguez	1.5			1.5		1,072.50	Edit document requests and interrogatories; attention to correspondence regarding agenda; outline edits to agenda.
3/11/2018	Jae K. Park	0.4			0.4		236	Further revise and edit second set of requests for production of documents to plaintiff.
3/11/2018	Tony K. Lu	1.3			1.3		520	Revise proposed joint status conference agenda (.5); Revise and draft supplemental responses to request for production (.7);Attention to letter to counsel re: rolling production (.1)
3/12/2018	Suzanne D. Smith	4.8					1,584.00	Review Larson deposition; Prepare abstract.
3/12/2018	Kristen C. Rodriguez	4.5			4.5		3,217.50	Edit interrogatories and document requests (1.7); Review updated production (0.7); Edit responses to document requests (1.0); edit joint agenda (0.5); correspondence regarding Dan Larson transcript (0.6);
3/12/2018	Tony K. Lu	3.6			3.6		1,440.00	Attention to and draft response to agenda items and discovery requests (.4); Attention to and revise joint agenda and responses to request for production and internal correspondence re: same (2.6); Telephone with Claudia Beckwith re: affidavit (.2); Teleconference with K. Rodriguez re: service of discovery matters (.2); E-File joint agenda for conference (.2)
3/12/2018	T. Carter. White	8.3		3.3	5		4,025.50	Revise Iowa open records request regarding audit response based on comments from K. Rodriguez (1); prepare for and call US Attorneys FOIA line to follow up on denial (.5); review non-confidential portions of production to assist in confidentiality designations (1); revise interrogatories and documents requests based on comments from A. Gilbert, finalize same and prepare for service (1); research public disclosure bar including 8th circuit cases discussing partial reliance, corroboration by public disclosure, and 8th circuit's interpretation of "based on" requirement (3.3); review and analyze prior research on privilege when government does not intervene (1); review and analyze IRL submissions to house of representatives (.5)
3/12/2018	Alan S. Gilbert	0.3			0.3		322.5	Review draft interrogatories and e-mail to K. Rodriguez regarding same.

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Date	Name / Invoice Number	Hours	Plds, Mtn, Brief	Research	Investigation	Interviewing	Amount	Description
3/12/2018	Jae K. Park	6.5			6.5		3,835.00	Review and analyze medical records audited by Iowa Department of Health Services and Medicaid to identify instances of purported violations and establish materiality defense.
3/13/2018	Jae K. Park	7.7			4.7		4,543.00	Prepare memorandum summarizing each alleged violation of Medicaid protocol in Plaintiffs' Third Supplemental Response to Interrogatories (4.7); prepare for and attend team telephone conference (1.5); review updated task list (0.3); email clerk of Southern District of Iowa requesting CM/ECF registration and access (0.2).
3/13/2018	Tony K. Lu	3			0.3		1,200.00	Participate in weekly teleconference with team re: discovery and summary judgment issue (1.5); Email communication to Dan Larson re: deposition and voicemail to Dinny Nielsen re: affidavit (.3); Update task list for weekly teleconference call (1.1)
3/13/2018	T. Carter. White	9.2		3	6.2		4,462.00	Review and analyze ADF audit summaries submitted to Congress (1); follow up research on public disclosure bar, including requirement of providing info to government, retroactivity, and what constitutes public disclosure (2); draft summary of public disclosure bar research (1); designate confidential testimony for S. Thayer, P. Laube, and D. Larson deposition (2); weekly strategy call with K. Rodriguez et al. (1); review and analyze status of abortion sampling dispute with opposing counsel (1); review and analyze discovery served on Plaintiff (1.2).
3/13/2018	Kristen C. Rodriguez	1.5			1.5		1,072.50	Attend team meeting (1.4); Call with client (0.1).
3/13/2018	Suzanne D. Smith	4.9					1,617.00	Participate in team call; revise deposition abstract; Update shared drive to include deposition exhibits
3/14/2018	Kristen C. Rodriguez	3.5			3.5		2,502.50	Teleconference with T. Lu regarding status conference preparation (0.4); Prepare for status conference on 3/15 (1.5); Attention to correspondence regarding abortion patient sampling (0.3); Review and edit initial disclosures (1.3).
3/14/2018	Jae K. Park	4.3			4.3		2,537.00	Continue review and analysis of medical records audited by Iowa Department of Health Services and Medicaid to identify instances of purported violations and establish materiality defense.
3/14/2018	Tony K. Lu	4.1	0.4	0.6	3.1		1,640.00	Plan and prepare for status conference (1.3); review and analyze correspondence related to AB issues to assist Carter White in review (.5); Teleconference with Kristen Rodriguez re: status conference preparation (.4); Conduct legal research on motion to compel documents from third party or in possession of counsel (.6); Revise supplemental initial disclosures (.9); Start prep of summary judgment statement of material facts (.4)
3/14/2018	T. Carter. White	3.9	0.2	2.3	1		1,891.50	Review and analyze additional emails regarding abortion patient sampling (1.0); analyze and respond to comments from K. Rodriguez regarding public disclosure bar research (0.3); review and analyze motion to compel (0.4); revise, finalize, and file pro hac vice motion (0.2); research requirements that relator provide information to gov't before filing suit (2.0).
3/14/2018	Daniel Pina	1.3					455	Pro Hac Vice rules, procedures, ECF Application, form of Motion for Iowa Southern District Court, meeting with C. White and assist with electronic filing of papers.
3/15/2018	Tony K. Lu	4.5			4.5		1,800.00	Attention to revision of Rule 26 disclosures and correspondence with counsel re: same (.6); Plan and prepare for status hearing conference with court (.8); Participate in status conference before the court (1.3); Teleconference with K. Rodriguez re: follow-up to issues presented during conference (.3); Review and analyze supplemental expert report of Wendy Knau (.5); Attention to plaintiff's exhibits and download and review re: same (.3); Review plaintiff's correspondence on discovery documents and start review of same to identify relevant portions (.7)

Date	Name / Invoice Number	Hours	Plds, Mtn, Brief	Research	Investigation	Interviewing	Amount	Description
3/15/2018	T. Carter. White	3.8		1.9	1.9		1,843.00	Finalize open records request to Iowa (0.4); call with R. Sangiacomo regarding abortion patient sampling (0.3); review and analyze prior correspondence to identify Plaintiff's issues with abortion sampling records (0.5); research case law to support argument that essential elements of fraud were publicly disclosed (1.9); review and analyze ADF public disclosure for reference to Iowa (0.4); review and analyze plaintiff's exhibits (0.3).
3/15/2018	Alan S. Gilbert	0.6					645	Conferences with K. Rodriguez regarding status hearing and next steps.
3/15/2018	Jae K. Park	3.3			3.3		1,947.00	Continue review of key documents and medical files to determine whether practice is material violation of Medicaid regulations (2.2); begin review of Plaintiff's expert report (1.1).
3/15/2018	Suzanne D. Smith	0.8					264	Update shared drive to include additional deposition exhibits and transcripts.
3/16/2018	Suzanne D. Smith	1					330	Prepare additional document for production
3/16/2018	Tony K. Lu	6.1		1.3	4.8		2,440.00	Review and analyze deposition transcript of Jennifer Warren Ulrick for purpose of summary judgment (3.2); Conduct research and review statutory law pertaining to prescription of contraceptives in Iowa (1.3); Continue review and analysis of client documents in response to plaintiff's demand for discovery (1.6)
3/16/2018	Alan S. Gilbert	2			2		2,150.00	Review plaintiff's expert's report.
3/16/2018	Alan S. Gilbert	0.3					322.5	Conference with K. Rodriguez regarding plaintiff's expert report.
3/16/2018	T. Carter. White	0.5			0.5		242.5	Call with V. Jolly at DOJ regarding FOIA response (0.3); confirm open records request sent to Iowa (0.1); review correspondence regarding expert reports (0.1).
3/16/2018	Jae K. Park	2.2		1			1,298.00	Consider and analyze strategy for addressing plaintiff's late disclosure of expert report (0.7); telephone conference with local counsel regarding strategy same (0.5); perform legal research regarding same (1.0).
3/17/2018	Suzanne D. Smith	3.7					1,221.00	Review Ulrick deposition for abstracting
3/18/2018	Suzanne D. Smith	2.3					759	Review deposition for preparation of abstract.
3/19/2018	Suzanne D. Smith	8.6					2,838.00	Review Ulrick deposition; Prepare deposition exhibit index; Participate in team call;
3/19/2018	Kristen C. Rodriguez	2.3					1,644.50	Team meeting (1.0); correspondence with team regarding discovery issues (0.5); analysis for summary judgment (0.8).
3/19/2018	Jae K. Park	4.5			4.2		2,655.00	Draft report to team regarding status of assigned task (0.3); review and analyze expert report of Plaintiff's expert Knau (0.8); draft memorandum summarizing analysis of report and considerations (3.4).
3/19/2018	Tony K. Lu	5.7	1.2	0.6	3.9		2,280.00	Review expert report and Iowa Medicaid Enterprise guidance on billing issues to supplement statement of material facts (1.1); Participate in weekly teleconference with team (1.1); Start draft of statement of material facts for summary judgment (1.2); Revise weekly agenda to circulate to team (1); Research and review of statute concerning pharmacies and application thereof to family planning clinics (.6); Review and analyze Order on motion to dismiss third amended complaint for purpose of supplementing statement of material facts and conduct research re role of nurse practitioner under order of physician(.7)
3/19/2018	T. Carter. White	3.9		1.5	1.2		1,891.50	Analyze options for proceeding with FOIA request re: government's decision not to intervene (0.4); identify complaints with abortion sampling files based on review and analysis of R. Sangiacomo emails (0.8); research timing of communications to government vis a vis filing of complaint (1.5); team call regarding strategy and to do list going forward (1.2).
3/20/2018	Alan S. Gilbert	0.5					537.5	Conferences with K. Rodriguez regarding representation of witnesses.
3/20/2018	Jae K. Park	5.3		5.3			3,127.00	Legal research regarding propriety of expert testimony and grounds to exclude legal conclusions.

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3/20/2018	Tony K. Lu	6.5	3.7		2.8		2,600.00	Review and analyze analysis of expert opinion (.1); Review Paula Laube deposition transcript for errata purposes (1.1); Review Title X protocols and publications for definition of clinician (.3); Continue draft of statement of material facts (3.7); Telephone with Kristen Rodriguez and Mike Falkstrom (.2); Draft letter to opposing counsel concerning request for PPFA S&Gs (.9); Teleconference with Jae Park re: deposition of Claudia Beckwith (.2)
3/20/2018	T. Carter. White	4.3		1.9	2.4		2,085.50	Draft supplemental responses to interrogatories (1.7); review and analyze supplemental Knau report (0.7); research ability to use public disclosures regarding Planned Parenthood affiliates (1.9).
3/20/2018	Suzanne D. Smith	7.8					2,574.00	Update shared drive to include deposition transcripts and abstracts; Update discovery index and shared drive; Review deposition transcripts for abstract preparation.
3/20/2018	Kristen C. Rodriguez	2.1			2.1		1,501.50	Analysis and strategy regarding third party witness depositions (0.3); federal FOIA (0.8); review of Knau report (1.0).
3/21/2018	Suzanne D. Smith	1					330	Prepare abstract of Ulrick
3/21/2018	Jae K. Park	6.8		4.6	0.2		4,012.00	Continue research grounds to exclude expert witness (4.2); draft memorandum summarizing same (2.4); multiple attempts to telephone Claudia Beckwith regarding deposition (0.2).
3/21/2018	T. Carter. White	6.1		4	2.1		2,958.50	Draft summary of relevant out of state audits; call potential counsel for third party witnesses (2.1); research case law supporting argument that plaintiff cannot revive dismissed claims at summary judgment (2); research case law holding claims not asserted in complaint will not be considered on summary judgment (2).
3/21/2018	Tony K. Lu	5.5	5.5				2,200.00	Continue draft of statement of undisputed material facts (5.4); Telephone with Jae Park and attempted contact of Claudia Beckwith (.1)
3/22/2018	Carmen A. Valero	1					340	Research and obtain 2011 report to Congress by Alliance Defending Freedom on Planned Parenthood state audits, for C. White.
3/22/2018	T. Carter. White	6.1		5.3	0.8		2,958.50	Identify potential research needs based on review of prior research done for FCA summary judgment brief (0.5); e-mail J. Park re: same (0.4); review and analyze supplemental Knau report (0.8); research Iowa public disclosure bar (1.6); draft summary of research on additional theories not in complaint or previously dismissed that plaintiff may not rely on at summary judgment (1.5); research ability to use un-supported and self-serving testimony on summary judgment (0.8); review analysis and research regarding ability to exclude supplemental Knau report (0.5).
3/22/2018	Tony K. Lu	5.8	3.7		2.1		2,320.00	Continue draft and revision of statement of undisputed material facts(3.7); Review Marj Easter deposition transcript for accuracy (.7); Search for and review additional Relativity documents for relevance in summary judgment (.8); Review and analyze document production for supplemental production (.3); Teleconference with Jae Park and Claudia Beckwith re: deposition (.3);
3/22/2018	Jae K. Park	3.9			3.9		2,301.00	Supplement email memorandum regarding DHS's audit of PPH medical records and practice of dispensing medication prior to prescription; multiple phone conferences regarding Claudia Beckwith; conference with local counsel Stan Thompson regarding declaration or affidavit to authenticate fee schedules.
3/22/2018	Suzanne D. Smith	3.3					1,089.00	Final review of Ulrick deposition; Review Easter deposition
3/22/2018	Kamie Oehrle	2		2			590	Legislative history research regarding the Iowa False Claims Act, per request from Carter White.
3/22/2018	Kristen C. Rodriguez	2.6		2.6			1,859.00	Correspondence and analysis regarding public disclosure defense, third party witnesses, ESI costs; review of expert report.

Date	Name / Invoice Number	Hours	Plds, Mtn, Brief	Research	Investigation	Interviewing	Amount	Description
3/23/2018	Kristen C. Rodriguez	3.1			3.1		2,216.50	Correspondence and analysis regarding third party witnesses (0.4); edit correspondence to plaintiff's counsel regarding S&Gs (0.5); review and edit confidentiality designations and accompanying letter for Thayer deposition (1.7); call with B. Seimer regarding deposition (0.5).
3/23/2018	Alan S. Gilbert	0.3					322.5	Conference with K. Rodriguez regarding recalcitrant witness.
3/23/2018	Jae K. Park	2.5			2.5		1,475.00	Telephone conference with Claudia Beckwith (0.3); draft email memorandum regarding phone call results (0.2); telephone conference with Ms. Kristen Rodriguez regarding strategy (0.5); draft affidavit of Bob Schlueter (1.5).
3/23/2018	Tony K. Lu	5.9	5.9				2,360.00	Continue draft and revision of statement of undisputed material facts (4.5); Telephone communication with Jae Park and Claudia Beckwith re: deposition (.4); Telephone with Dinny Nielsen re: witness affidavit and deposition (.3); Update and revise weekly agenda for team (.5); Review and revise correspondence to opposing counsel re: PPFA S&Gs (.2)
3/23/2018	T. Carter. White	2.4		0.8	1.6		1,164.00	Review and analyze older reports from ADF regarding state audits of PP (0.5); review and analyze supplemental Knau report (0.3); follow up e-mail to potential local counsel for third party witnesses (0.3); draft cover letter regarding confidentiality designations (0.5); research Iowa's right to recover under federal FCA for purposes of retaining local counsel (0.8).
3/24/2018	Kristen C. Rodriguez	1			1		715	Review audit files.
3/25/2018	Kristen C. Rodriguez	0.6			0.6		429	Attention to correspondence regarding motion to reconsider brief and supporting research.
3/25/2018	Kristen C. Rodriguez	3.1	1.4		2.1		2,216.50	Correspondence with J. Park regarding certification of fee schedules (0.4); review audit files (1.7); review draft of statement of undisputed facts (1.4).
3/26/2018	Kristen C. Rodriguez	2.1			1		1,501.50	Team Call (1.1); meet with expert (1.0).
3/26/2018	Jae K. Park	1.7			0.2		1,003.00	Multiple attempts to telephone Becky Parrish and Claudia Beckwith (0.2); review agenda (0.3); prepare for and attend litigation team weekly status and strategy telephone conference (1.2).
3/26/2018	Tony K. Lu	2			0.4		800	Participate in teleconference with team re: revised and updated agenda (1.1); Telephone with Jae Park and Claudia Beckwith re: deposition (.4); Update weekly agenda and attention to review of tab documents (.5)
3/26/2018	T. Carter. White	3.7	2.2				1,794.50	Review and analyze task list and identify priorities (0.1); emails with potential counsel for third party witnesses regarding representation at depositions (0.2); team call regarding strategy, to do list, and next steps (1.2); review and analyze draft facts section (2.2).
3/27/2018	Kristen C. Rodriguez	1.6					1,144.00	Correspondence regarding sampling issue; witness scheduling; meet and confer prep; analysis regarding certification issue.
3/27/2018	Daniel Pina	0.3					105	Analyze communication related to court filing and related communication (.1); obtain and furnish copy of motion papers to G. Bovenzi (.2).
3/27/2018	T. Carter. White	8.7	4.7	2	2		4,219.50	Review draft statement of undisputed material facts (2); calendar confidentiality designation deadlines (.2); draft summary judgment insert regarding public disclosure bar (2.7); work with library on obtaining evidence of public disclosure of audits (.4); research ability to take depositions after the close of discovery (1); research viability of statistical sampling and extrapolation to prove liability in FCA cases (1); call US Attorneys regarding FOIA response (.2); review and analyze decisions involving W. Britton as expert (.7).
3/27/2018	Tony K. Lu	0.1			0.1		40	Communication with opposing counsel concerning meet and confer (.1)
3/28/2018	Tony K. Lu	1.2			1.2		480	Participate in teleconference with opposing counsel re: issues from March 15 conference (.9); Review and revise joint statement (.3)
3/28/2018	T. Carter. White	3		1.2	1.8		1,455.00	Research on statistical sampling and extrapolation to prove liability in FCA cases (1.2); meet and confer call with opposing counsel regarding sampling, depositions, and PPFA protocols (1.0); draft recap letter of meet and confer conversation (0.5); finalize and send same (0.3).

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3/28/2018	Alan S. Gilbert	0.2					215	Conference with K. Rodriguez regarding discovery issue for meet and confer.
3/28/2018	Kristen C. Rodriguez	2.1			2.1		1,501.50	Prepare for meet and confer (0.5); call with plaintiff's counsel (0.7); draft recap letter (0.5); edit joint status report (0.4).
3/29/2018	Mary K. Ciziunas	1.4					413	Research to locate mentions of a three Planned Parenthood audits prior to March 2011 per C. White.
3/29/2018	Tony K. Lu	0.7					280	Attention to correspondence and revision related to joint status report (.7)
3/29/2018	T. Carter. White	5.3	5	0.3			2,570.50	Review and analyze prior research regarding W. Britton Knau testimony in other FCA cases (0.3); review and revise public disclosure bar insert for SJ brief (1.5); email with J. Park regarding attacking expert report (0.4); outline motion to exclude expert testimony based on preliminary research and review of expert report (3.1).
3/30/2018	Mary K. Ciziunas	3.2					944	Research to locate mentions of a three Planned Parenthood audits prior to March 2011 per C. White.
3/30/2018	Suzanne D. Smith	2.9					957	Revise Ulrick abstract, forward to attorneys for review.
3/30/2018	Kristen C. Rodriguez	1.2			1.2		858	Analysis of supplemental expert report.
3/30/2018	T. Carter. White	3.7		3.7			1,794.50	Research standards for excluding expert testimony, including it being legal conclusions, lacking foundation, and invading the province of the jury; review and analyze Knau expert report.
3/31/2018	Suzanne D. Smith	1.6					528	Review Easter deposition for preparation of abstract.
4/1/2018	Kristen C. Rodriguez	0.8					572	Review expert report.
4/1/2018	Jae K. Park	3.3	3.3				1,947.00	Work on motion for summary judgment.
4/2/2018	Jae K. Park	5.3	4.2		1.1		3,127.00	Prepare for and attend weekly team telephone conference (1.1); work on motion for summary judgment (4.2).
4/2/2018	Suzanne D. Smith	4.2					1,386.00	Attend team telephone conference (1.1); update exhibit chart and shared drive (.9); continue work on deposition abstracts (2.2).
4/2/2018	Kristen C. Rodriguez	1.5	0.4		1.1		1,072.50	Attend team meeting (1.1); correspondence with J. Park regarding fee schedule issue (.4).
4/2/2018	T. Carter. White	5.6	3.6		2		2,716.00	Review and analyze articles regarding Washington state Planned Parenthood audit (.8); prepare for team call with review and analysis of task list (.2); team call regarding strategy and next steps (1.1); review and revise supplemental interrogatory responses (.5); draft outline of motion to exclude expert testimony based on review and analysis of expert report and third supplemental interrogatory responses (2.8); emails with local counsel for B. Simer (.2).
4/2/2018	Tony K. Lu	2.2			2.2		880	Update task list and attention to Pam Estes transcript and supplemental expert report (.8); Email communications to client (.3); Participate in weekly teleconference with team (1.1)
4/3/2018	Tony K. Lu	3.7	0.6		3.1		1,480.00	Review fourth motion to compel (.6); Review and analyze deposition transcript of Pam Estes for errata purposes (2.6); Review deposition of Dan Larson for errata purposes (.5)
4/3/2018	T. Carter. White	5.3	2.7	0.8	1.8		2,570.50	Review and analyze supplemental Knau opinions regarding FPCI protocols (1.2); update outline of motion to exclude expert testimony with same (1.3); research public disclosure dates of state audits (.8); mark up J.W. Ulrick deposition testimony for confidentiality (1.1); review and revise supplemental interrogatory responses (.5); review and analyze letter from R. Hixson discussing abortion patient sampling (.2); review and analyze motion to compel (.2).
4/3/2018	Kristen C. Rodriguez	0.6			0.2	0.4	429	Call with B. Seimer (.4); Review letter correspondence from plaintiff's counsel regarding abortion patient files (.2).
4/3/2018	Suzanne D. Smith	2.1					693	Review Estes deposition and prepare and revise abstract.
4/3/2018	Jae K. Park	10.4	10.4				6,136.00	Work on motion for summary judgment.
4/4/2018	Jae K. Park	12.7	11.3		1	0.4	7,493.00	Attend telephone conference with team regarding case status and CMS-1500 claim form issues (.6); telephone conference with Ms. Lissa Singer regarding analysis of Wendy Knau's report (.4); conference with Ms. Kristen Rodriguez regarding Ms. Lisa Singer's projects (.4); work on motion for summary judgment (11.3).

Date	Name / Invoice Number	Hours	Plds, Mtn, Brief	Research	Investigation	Interviewing	Amount	Description
4/4/2018	Alan S. Gilbert	0.5	0.5				537.5	Review outline of possible motion to strike expert reports.
4/4/2018	T. Carter. White	7.7	1.4	5.6	0.7		3,734.50	Review and revise public disclosure bar argument with additional disclosures of Washington audit (1.4); call federal FOIA agent regarding denial (.3); call with J.W. Ulrick (.4); research case law to support various arguments in support of motion to exclude expert testimony, including that expert cannot summarize evidence, testify on subjects lay people can understand, and is not qualified to testify as to statistical sampling (5.6).
4/4/2018	Kristen C. Rodriguez	2.9			2.9		2,073.50	Call with clients (.4); edit interrogatory supplemental response (.4); review and analyze expert report (.8); draft correspondence to opposing counsel regarding abortion claims (.5); review medical records from audit and claims data (.8).
4/4/2018	Tony K. Lu	1.4	0.2		1.2		560	Prepare for teleconference with team (.6); Participate in teleconference with Team (.6); Meet and confer with Kristen Rodriguez re: motion to compel (.2)
4/5/2018	Kristen C. Rodriguez	4.7	3.2		1.5		3,360.50	Prepare for and attend meeting with A. Gilbert regarding strategy and response to expert report (2.3); Edits to correspondence to opposing counsel regarding abortion patient sample (.4); review prior correspondence to determine how abortion patient sample was selected (.3); attention to correspondence regarding FOIA requests for other state audits (.3); call with C. White regarding B. Simer deposition and audit files (.5); review summary judgment brief draft (.9).
4/5/2018	Alan S. Gilbert	2	2				2,150.00	Conference with K. Rodriguez regarding strategy on summary judgment and experts.
4/5/2018	T. Carter. White	7.2		4	3.2		3,492.00	Draft letter to R. Hixson regarding additional patient sampling (.5); revise same based on comments from K. Rodriguez and review of emails and letters discussing sampling issue (.6); research case law to support motion to exclude expert testimony, including cases concluding expert lacked basis for opinion on industry standard, cannot opine on someone's knowledge or state of mind, and cannot opine on issues of law (4); review and mark up deposition transcript of M. Easter for confidentiality (1.6); conference with K. Rodriguez regarding expert motion, prep of B. Simer, and abortion sampling (.5).
4/5/2018	Suzanne D. Smith	5.2					1,716.00	Update shared drive for attorney review (.8); Prepare deposition abstracts (4.4).
4/6/2018	Suzanne D. Smith	5.5					1,815.00	Prepare S. Thayer deposition abstract
4/6/2018	Tony K. Lu	0.1			0.1		40	Attention to issue raised by C. White concerning the sampling process for AB files -0.1
4/6/2018	T. Carter. White	7.4		2.3	5.1		3,589.00	Revise letter regarding patient sampling based on review and analysis of letters, emails, orders, and calls reflecting the agreed to process (3.2); compile documents to share with B. Simer and her counsel (.7); draft document to use to prep counsel for B. Simer, including our and plaintiff's expected questioning (1.2); research propriety of expert testimony on issues of materiality and knowledge (2.3).
4/6/2018	Kristen C. Rodriguez	1			1		715	Review Laube deposition confidentiality designations (.9); serve plaintiff's counsel (.1).
4/7/2018	Suzanne D. Smith	1					330	Prepare shared drive folder of Summary Judgment exhibits.
4/8/2018	Kristen C. Rodriguez	4.2	3	1.2			3,003.00	Edit SUF for summary judgment (3); research legislative history re: Iowa Code 155.A (1.2).
4/8/2018	T. Carter. White	0.2			0.2		97	Search for list of patients previously searched for in connection with second motion to compel.
4/8/2018	Suzanne D. Smith	2.9					957	Revise deposition abstracts to include key terms.
4/9/2018	Suzanne D. Smith	5.9					1,947.00	Attend team call (1); Update deposition abstracts to include key terms (2.8); Pull exhibits to be used in appendix to SJ brief (2.1).
4/9/2018	Jae K. Park	5.4	4		1.4		3,186.00	Continue working on motion for summary judgment (4); prepare for and attend weekly team status conference (1.2); read and respond to Ms. Lissa Singer's email regarding rescheduling call to discuss Plaintiff's expert's supplemental report (.2).

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4/9/2018	Kristen C. Rodriguez	1.6	0.9		0.7		1,144.00	Correspondence regarding B. Seimer deposition (.3); verification for interrogatory responses with additional witnesses (.4); work on summary judgment strategy (.9).
4/9/2018	Tony K. Lu	8.5	6.4		2.1		3,400.00	Attention to issue pertinent to abortion files and internal investigation (.4); Attention to and review and compile S&G documents for K. Rodriguez in anticipation of opposition to motion to compel (.4); Email communications with client and opposing counsel (.4); Update weekly agenda and participate in weekly teleconference with team (1.3); Continue draft and revision of statement of material facts per K.Rodriguez comments (6)
4/9/2018	T. Carter. White	3.8			3.8		1,843.00	Identify patient numbers previously searched for related to abortion sampling (.7); edit B. Simer deposition prep based on review of prior call notes (.6); prepare for and have team call regarding strategy, case status, and to do items (1.2); review and analyze S. Haskell deposition testimony (1.2); review and respond to email from J. Glazebrook regarding deposition scheduling (.1).
4/10/2018	Kristen C. Rodriguez	1.5		1.2	0.2		1,072.50	Research regarding Medicaid audit (1.2); attention to research and analysis regarding proper sampling uses (.2).
4/10/2018	Jae K. Park	8.3	8.3				4,897.00	Continue working on motion for summary judgment.
4/10/2018	Suzanne D. Smith	6.4					2,112.00	Prepare S. Haskell's deposition abstract (4.5); Pull exhibits for SJ filing (1.9).
4/10/2018	Alan S. Gilbert	0.2			0.2		215	Conference with K. Rodriguez regarding PPIL Medicaid audit.
4/10/2018	T. Carter. White	3.9			3.9		1,891.50	Review and analyze S. Haskell deposition transcript (1.4); update list of patients previously searched for and letter to opposing counsel regarding same based on review and analysis of initial patient last and cross reference against patient files plaintiff has deemed acceptable (1.8); work on state FOIA requests to gain more information on dates of disclosure of Illinois and NY audits (.7).
4/10/2018	Tony K. Lu	4.2	4.2				1,680.00	Continue draft and revision of statement of undisputed facts (3.2) ; Start draft of outline of opposition to fourth motion to compel (1)
4/11/2018	Tony K. Lu	2.5	2.5				1,000.00	Continue draft and revision of statement of material facts for summary judgment (2.5)
4/11/2018	Tony K. Lu	5.1	4.8		0.3		2,040.00	Start draft of opposition to fourth motion to compel (4.8); Attention to OCP spreadsheet issues in support of C. White (.2); Review discovery responses from Plaintiff (.1)
4/11/2018	Suzanne D. Smith	3.8					1,254.00	Prepare S. Haskell's deposition abstract
4/11/2018	Jae K. Park	6.3	5.1	1.2			3,717.00	Continue working on motion for summary judgment (4.2); perform related legal research (1.2); review file to identify select documents to use as exhibits (.7); review local rules (.2).
4/11/2018	T. Carter. White	4.5	1.3	1.4	1.8		2,182.50	Supplemental research regarding disregarding self-serving testimony on summary judgment (1.4); revise, finalize, and send out letter to opposing counsel regarding patient sampling (.5); review and revise FOIA requests regarding public disclosure bar argument (.5); e-mails with T. Lu regarding OCP patient sampling (.2); review and analyze SJ argument (1.3); review and analyze interrogatory and document requests responses from plaintiff (.6).
4/12/2018	T. Carter. White	6.4	1.8	0.8	3.8		3,104.00	Review and analyze revised statement of facts (1.8); research burden of proof in FCA cases (.8); review, analyze, and take notes regardig OCP smapling letters and discovery (1); draft and send letter enclosing D. Larson testimony confidentiality designations (.3); edit confidentiality designations (2.3); draft letter enclosing JWU testimony confidentiality designation (.2).
4/12/2018	Tony K. Lu	7.8	4.8	3			3,120.00	Conduct legal research in support of resistance to motion to compel (3); Continue draft and revision of resistance to motion to compel (4.1); Revise statement of undisputed facts (.7)
4/12/2018	Jae K. Park	7.5	7.5				4,425.00	Continue working on motion for summary judgment.

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4/12/2018	Kristen C. Rodriguez	2.9	2.4		0.5		2,073.50	Work on summary judgment brief (1.8); Review motion to compel response (.6); Correspondence with client (.2); confer with C. White regarding audit (.3).
4/12/2018	Suzanne D. Smith	4.1					1,353.00	Finalize Haskell abstract (1.8); Review Estes deposition (2.1); Update exhibit spreadsheet (.2).
4/13/2018	Tony K. Lu	7.5	6.8		0.7		3,000.00	Start draft of affidavit in support of resistance to fourth motion to compel (2.5); Draft section of summary judgment motion related to statement of facts (4.3); Telephone discussion with K. Rodriguez re: Resistance to Motion to Compel (.7).
4/13/2018	Kristen C. Rodriguez	2.4	1.7		0.7		1,716.00	Review motion to compel response (1.7); Review and edit confidentiality designation of deposition (.7).
4/13/2018	T. Carter. White	1.5		1.5			727.5	Research burden of production on summary judgment (1.2); draft e-mail summarizing same (.3).
4/14/2018	Suzanne D. Smith	0.6					198	Review SJ draft and pull deposition cites.
4/15/2018	Suzanne D. Smith	1.5					495	Review SJ brief and pull additional dep pages for exhibit use.
4/15/2018	Tony K. Lu	2.1	0.7	1.4			840	Conduct additional legal research on document preservation requirements in support of opposition to fourth motion to compel (1.4); Revise draft of opposition to fourth motion to compel (.7)
4/16/2018	Jae K. Park	5.7	5.7				3,363.00	Continue working on motion for summary judgment.
4/16/2018	Kristen C. Rodriguez	3	1.4		1.6		2,145.00	Edit B. Seimer deposition prep outline (1.2); Edit motion to compel response and supporting declaration (1.4); Correspondence with PPFA (.2); Correspondence with A. Gilbert (.2).
4/16/2018	Suzanne D. Smith	2.1					693	Pull additional dep pages for exhibit use in SJ (1.9); Update shared drive to include key pleadings (.2).
4/16/2018	Suzanne D. Smith	3.2					1,056.00	Review Estes deposition and prepare abstract (2.2). Revise additional abstracts (.8); add to shared drive for attorney review (.2).
4/16/2018	Tony K. Lu	8	7.6		0.4		3,200.00	Continue draft and revision of Resistance to Fourth Motion to compel (3.8); Review, research, analyze draft motion for summary judgment and propose additional arguments (2.4); Attention to exhibits for resistance to fourth motion to compel and revise draft of affidavit of JWU (1.4); Telephone with Carter White re: OCP Spreadsheet (.2); Email communication to Mike Falkstrom (.2)
4/16/2018	Alan S. Gilbert	0.4	0.4				430	Review draft response to motion to compel and comments on same.
4/16/2018	T. Carter. White	6.3	0.4		5.9		3,055.50	Identify process for producing twenty-eight sample OCP patient files based on review and analysis of emails, letters, and spreadsheets regarding this issue (4.8); review and analyze declaration supporting fourth motion to compel (.4); update status of tasks on team agenda (.4); coordinate deposition scheduling for B. Simer (.3).
4/17/2018	Tony K. Lu	10.6	8.1	0.8	1.7		4,240.00	Participate in teleconference with team re: summary judgment and other issues (1); Teleconferences with Alan Gilbert, etc. re: responses (1.3); Draft motion to seal (.4); Revise and update weekly agenda (.4); Conduct analysis and research on retroactive application of statutory change and write email memo re: same (.8); Continue to draft and revise statement of material facts (2.3); Continue draft and revision of opposition to motion to compel and attention to exhibits and filing re: same (4.4);
4/17/2018	Kristen C. Rodriguez	6.5	3.5		3		4,647.50	Review audit results and correspondence regarding same (1.2); Correspondence and analysis with team regarding summary judgment arguments (.4); Lead team status call (1); Call with C. White to prepare for B. Seimer deposition (.4); Calls with client (.4); Edit and finalize motion to compel opposition (.7); Edit summary judgment brief (2.4).
4/17/2018	Suzanne D. Smith	4.2					1,386.00	Attend weekly team call (1); Prepare table of contents for appendix (.9); Prepare Estes abstract (2.3).
4/17/2018	Jae K. Park	8.4	7.4		1		4,956.00	Continue working on motion for summary judgment (7.4); telephone conference with team regarding status and strategy (1).

Time Entry Records in
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Date	Name / Invoice Number	Hours	Plds, Mtn, Brief	Research	Investigation	Interviewing	Amount	Description
4/17/2018	T. Carter. White	8.6	3.5		5.1		4,171.00	Review, analyze, and comment on revised summary judgment brief and update public disclosure bar section with additional information obtained (3.5); review and analyze denied Illinois FOIA request including statutory bases for denial (.4); review and analyze K. Rodriguez comments to B. Simer deposition prep document (.4); review and comment on plaintiff's request to share documents with DOJ (.3); team call regarding status of case, strategy, and action items (1); call with K. Rodriguez regarding B. Simer deposition prep (.3); mark up S. Haskell deposition transcript for confidentiality (1.7); edit confidentiality markup for M. Easter deposition transcript (1).
4/17/2018	Alan S. Gilbert	0.7	0.7				752.5	Conferences K. Rodriguez and T. Lu regarding response to motion to compel and plaintiff's request to share documents with DOJ.
4/17/2018	Alan S. Gilbert	0.2		0.2			215	Online research regarding DOJ attorney.
4/17/2018	Alan S. Gilbert	0.3			0.3		322.5	E-mails Y. Rodriguez and K. Rodriguez regarding PPL audit documents.
4/18/2018	Jae K. Park	5.2	4.8		0.4		3,068.00	Continue working on motion for summary judgment (4.8); communicate with Ms. Lissa Singer regarding investigation (.4).
4/18/2018	Tony K. Lu	8.1	8.1				3,240.00	Review and analyze summary judgment in preparation for discussion with team (.8); Participate in teleconference with team members to discuss summary judgment strategy (1.8); start research and draft of section of summary judgment related to 147.107 (4.2); Draft email to client (.5); Continue draft of statement of undisputed facts (.8)
4/18/2018	T. Carter. White	7.3	3.2	2.3	1.8		3,540.50	Review and comment on draft summary judgment motion (.7); review and analyze resistance to fourth motion to compel (.7); correct confidentiality markup of M. Easter deposition transcript (.2); compile citations for OCP analysis (.4); call with K. Rodriguez etc. regarding summary judgment strategy (1.8); research regarding government's right to information in case and whether government is client of relator's attorney (2); draft summary of same (.3); revise B. Simer deposition prep document (.5); review and analyze P. Estes deposition testimony and start marking up same for confidentiality (.7).
4/18/2018	Kristen C. Rodriguez	2.7	2.7				1,930.50	Correspondence regarding motion to compel response (.2); edit draft of summary judgment brief (.7); Lead team meeting regarding summary judgment brief (1.8).
4/19/2018	Kristen C. Rodriguez	2	1.3	0.3	0.4		1,430.00	Work on summary judgment brief (1.3); Review research re government's entitlement to pleadings when it elects not to intervene (.3); draft response to plaintiff's counsel regarding same (.2); Correspondence regarding consultant's findings (.2).
4/19/2018	Suzanne D. Smith	5.1					1,683.00	Prepare Estes abstract (2.9); Review SJ motion and add pin cites for depositions (2.2).
4/19/2018	Tony K. Lu	5.7	5.3		0.4		2,280.00	Continue draft and revision of statement of material facts (4); Continue draft and revision of section pertaining to 147.107(7) (1.3); Draft letter to counsel re: redactions (0.4).
4/19/2018	T. Carter. White	5.8		2.2	3.6		2,813.00	Review and analyze P. Estes deposition testimony and mark up same for confidentiality designation (1.8); follow up research on ability of government to access pleadings in qui tam case to answer questions from K. Rodriguez (2.2); finalize and send letter to opposing counsel regarding Easter deposition confidentiality (.3); review and analyze patient files for evidence that verbal orders were obtained and recorded (1.5).
4/19/2018	Jae K. Park	1	1				590	Telephone conference with Ms. Kristen Rodriguez regarding revisions to motion for summary judgment.
4/19/2018	Alan S. Gilbert	1			1		1,075.00	Conference with K. Rodriguez regarding DOJ involvement in case.
4/20/2018	Kristen C. Rodriguez	4	4				2,860.00	Edit summary judgment brief.
4/20/2018	Jae K. Park	10.3	10.3				6,077.00	Continue working on motion for summary judgment.

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Date	Name / Invoice Number	Hours	Plds, Mtn, Brief	Research	Investigation	Interviewing	Amount	Description
4/20/2018	T. Carter. White	6.7	2	4	0.7		3,249.50	Draft B. Simer declaration to support SJ motion (2); mark up P. Estes deposition transcript for confidentiality (.7); research how knowledge is imputed to corporation under FCA, including collective knowledge case (3.1); multiple calls with K. Rodriguez regarding same (.4); draft summary email of same (.5).
4/21/2018	T. Carter. White	1.4	1.4				679	Revise declaration of B. Simer based on comments from K. Rodriguez (.8); draft motion to file overlength SJ brief (.6).
4/21/2018	Suzanne D. Smith	4.7					1,551.00	Redact personal information for re-production of patient documents (4.1); Revise Haskell abstract (.6).
4/22/2018	Tony K. Lu	2.5	2.5				1,000.00	Start draft of affidavit in support of motion for summary judgment (2.5)
4/23/2018	Kristen C. Rodriguez	1.5	1.2		0.3		1,072.50	Correspondence and analysis with team regarding B. Seimer deposition (.3), public disclosure bar (.3), cover motion to accompany brief (.2), procedural history (.6), audit results materiality (.1).
4/23/2018	T. Carter. White	0.7		0.5	0.2		339.5	Draft letter transmitting P. Estes confidentiality designations (.2); review and analyze facts of cases imputing knowledge of false claims to corporation (.5).
4/23/2018	Tony K. Lu	3.1	1.9		1.2		1,240.00	Attention to and review redacted emails for Plaintiff's counsel and communication re: same (.3); Update weekly agenda (.4); write email to Jennifer Warren (.5); Continue draft and revision of declaration in support of motion for summary judgment (1); Update and revise Statement of material facts (0.9).
4/23/2018	Jae K. Park	5.4	5.1		0.3		3,186.00	Continue working on motion for summary judgment (5.1); communicate with team regarding thoughts on deposition of Becky Simer (.3).
4/23/2018	Suzanne D. Smith	2.9					957	Review updated SJ filing and pull additional exhibits and dep pages (2.5); key cite pleading (.4).
4/24/2018	Tony K. Lu	2.3	1.8		0.5		920	Participate in weekly teleconference with team (1); Draft email to opposing counsel re: Becky Simer (.3); Email to client (.1); Continue update of weekly agenda for team (.2); Review and analyze reply to 4th Motion to compel (.2); Review current version of draft summary judgment motion for statement of fact purposes (.5);
4/24/2018	Kristen C. Rodriguez	2.6	2.3		0.3		1,859.00	Attend team meeting (1); draft correspondence with opposing counsel (.2); review audit from PPIL for potential inclusion in brief (.3); review procedural history (.6); Correspondence regarding B. Seimer deposition (.1); Correspondence with local counsel regarding SJ due date and call to court regarding same (.2); Review and edit table of contents for appendix (.2).
4/24/2018	Suzanne D. Smith	4.6					1,518.00	Participate in weekly team call (1); Update shared drive to include hearing transcript, forward to team (.6); Update draft table of contents for Summary Judgment brief (.8). Update Estes deposition abstract (2.2)
4/24/2018	Alan S. Gilbert	0.3	0.3				322.5	Review plaintiff's reply in support of motion to compel.
4/24/2018	Alan S. Gilbert	0.5	0.5				537.5	Conferences with K. Rodriguez.
4/24/2018	Jae K. Park	3.6	3.6				2,124.00	Redraft portion of summary judgment motion regarding impact of results of 2006 Medicaid Audit (.8); prepare for and attend week team status and strategy call (1.1); prepare memorandum analyzing 2006 audited files and facts that support materiality defense (1.7).
4/24/2018	T. Carter. White	4.2	1.9	1.4	0.9		2,037.00	Review and analyze updated FOIA denial, including analysis of strength of our appeal (.6); review and analyze response from Illinois FOIA office (.3); draft procedural history section of SJ brief based on review and analysis of various docket entries, including different iterations of complaint, orders on motions to dismiss, and scheduling orders (1.9); research case law to support our raising of public disclosure bar on summary judgment (1.4).

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Date	Name / Invoice Number	Hours	Plds, Mtn, Brief	Research	Investigation	Interviewing	Amount	Description
4/25/2018	Jae K. Park	2.4	2.4				1,416.00	Prepare export of relevant and helpful medical records from 2006 audit for use as exhibits on motion for summary judgment (.2); redraft section of summary judgment motion on reasonable interpretation and lack of knowledge defense (1.6); perform legal research regarding same (.6).
4/25/2018	Tony K. Lu	4.6	4.4		0.2		1,840.00	Continue revision of SJ affidavit (.8); Draft email to Russ Hixson re: Becky Simer (.2); Teleconference with K. Rodriguez re: motion for summary judgment (.1); Continue draft and revision of statement of material facts (3.5)
4/25/2018	T. Carter. White	3.1	3.1				1,503.50	Review and analyze reply regarding fourth motion to compel (.4); revise procedural history insert based on comments from K. Rodriguez and review of complaints (2); draft cover motion for summary judgment (.7).
4/25/2018	Alan S. Gilbert	0.1			0.1		107.5	Conference with K. Rodriguez regarding PPIL audit.
4/25/2018	Kristen C. Rodriguez	7	5.6	1.4			5,005.00	Draft and revise summary judgment brief (4.7), including correspondence with team regarding same (.5), and research for publicly available audit information (1.4); correspondence with client (.4).
4/26/2018	Kristen C. Rodriguez	7.2	7.2				5,148.00	Draft and revise summary judgment brief (6.6), including correspondence with team regarding same (.6).
4/26/2018	Suzanne D. Smith	4.3					1,419.00	Review updated Summary Judgment memo and update pin cites regarding deposition testimony
4/26/2018	Tony K. Lu	8.2	8.2				3,280.00	Continue draft and revision of section on FCA reasonable interpretation (5.7); Teleconference with Kristen Rodriguez re: motion for summary judgment (1.1); Continue draft and revision of Statement of undisputed facts (1.4)
4/26/2018	T. Carter. White	3.8	2.4	1.4			1,843.00	Revise public disclosure bar argument section based on comments from K. Rodriguez (.7); supplemental research to support same (1.4); draft insert to fact section regarding other state audits (.7); draft revisions to statement of material facts based on changes to public disclosure argument (1).
4/26/2018	Alan S. Gilbert	0.5			0.5		537.5	Conferences with K. Rodriguez regarding Department of Justice and discovery matters.
4/26/2018	Jae K. Park	4.2	1.8	1.9	0.5		2,478.00	Continue redrafting section of summary judgment motion on reasonable interpretation and lack of knowledge defense (1.8); perform legal research regarding same (1.9); telephone conference with Lissa Singer (.5).
4/27/2018	Alan S. Gilbert	2	2				2,150.00	Review draft summary judgment brief and conference with K. Rodriguez regarding same.
4/27/2018	Tony K. Lu	0.7	0.5		0.2		280	Continue draft and revision of summary judgment brief (.5); Telephone with Jennifer Warren Ulrick (.2)
4/27/2018	T. Carter. White	0.6	0.6				291	Analyze public disclosure bar argument, including call with K. Rodriguez to discuss same.
4/27/2018	Kristen C. Rodriguez	6.2	5.4		0.8		4,433.00	Draft and revise summary judgment brief (4.1), including correspondence with team regarding same (.6); conference with A. Gilbert regarding same (.7); Attention to correspondence regarding revisions to protective order suggested by DOJ (.5); correspondence with opposing counsel regarding B. Simer deposition (.3).
4/28/2018	Suzanne D. Smith	4					1,320.00	Finalize Estes deposition abstract (2.1); Update shared drive to include additional key pleadings for attorney review (1); Update Table of Contents for SJ filing (.9)
4/30/2018	Suzanne D. Smith	2.8					924	Update shared drive to include additional key pleadings (2); Participate in team conference call (.8).
4/30/2018	Kristen C. Rodriguez	2.5	1.3		1.2		1,787.50	Prepare for and lead team meeting (1); attention to correspondence regarding Haskell confidentiality (.2), revised table of contents (.3), and results of FamPlan review for "medicaid doctor" issue (.3); attention to correspondence regarding redacted documents with opposing counsel (.3); attention to correspondence regarding NY audit issue (.4).

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Date	Name / Invoice Number	Hours	Plds, Mtn, Brief	Research	Investigation	Interviewing	Amount	Description
4/30/2018	T. Carter. White	1.3	1.1		0.2		630.5	Review and revise public disclosure bar argument section based on discussion with K. Rodriguez (.3); team call discussing open items and strategy (.8); research deadline for NY FOIL response (.1); finalize and send out P. Estes confidentiality designation (.1).
4/30/2018	Tony K. Lu	1.6	1		0.6		640	Update weekly task list (.4); Email communication to Stephen Hill re: communications with DOJ (.2); Participate in weekly teleconference with team re: discovery and summary judgment issues and email to Jennifer Warren Ulrick (.8); Review and analyze "Medicaid Doctor" issue (.2)
4/30/2018	Jae K. Park	0.7	0.7				413	Attend weekly status and strategy call.
5/1/2018	Suzanne D. Smith	3.8					1,254.00	Review court docket, order additional hearing transcripts for attorney review; Update shared drive to include key pleadings; Review emails regarding FamPlan and Medicaid Dr. documents; update Table of Contents.
5/1/2018	Tony K. Lu	0.5			0.5		200	Conduct review and analysis on medical records for purpose of Medicaid doctor review
5/1/2018	Jae K. Park	2.2			2.2		1,298.00	Telephone conference with L. Singer regarding results of her analysis of Plaintiff's expert's report and annotations of Exhibit 26.
5/1/2018	Kristen C. Rodriguez	4.3	4.3				3,074.50	Work on summary judgment brief and related documents.
5/2/2018	Kristen C. Rodriguez	6.1	6.1				4,361.50	Work on summary judgment brief and related documents; preparation for upcoming hearing.
5/2/2018	Tony K. Lu	3.5	1		2.5		1,400.00	Prepare for and teleconferences with Jennifer Warren Ulrick and Kristen Rodriguez re: case (1.5); Internal communications and attention to preparation for hearing on S&G motion to compel (1); Write outline of arguments for hearing (1)
5/2/2018	T. Carter. White	0.5			0.5		242.5	Review analysis of Medicaid Doctor billing and FamPlan conversion (0.3); circulate deadline for NY FOIL response (0.2).
5/2/2018	Alan S. Gilbert	0.5					537.5	Conference with K. Rodriguez regarding possible settlement and declaration issue.
5/2/2018	Alan S. Gilbert	0.8	0.8				860	Review and edit draft notice to court.
5/2/2018	Jae K. Park	5.5	5.5				3,245.00	Revise and supplement motion for summary judgment.
5/3/2018	Jae K. Park	9.4	5		4.4		5,546.00	Review and analyze Iowa Medicaid payment spreadsheet to verify instances where Planned Parenthood of the Heartland dispensed contraceptives without billing Medicaid (4.4); further revise and supplement motion for summary judgment; conduct further legal research regarding same (5.0).
5/3/2018	Tony K. Lu	3	1.3		1.7		1,200.00	Prepare for hearing on motion to compel (.6) Appear for and argue Resistance to Motion to compel before court in telephonic conference (.7); Teleconference with Kristen Rodriguez to strategize on motion hearing (.3); Teleconference with Penny Dickey (.7); Draft email updates to clients re: order (.7)
5/3/2018	Suzanne D. Smith	3.5					1,155.00	Review updated Statement and Affidavit. Pull additional transcript pages; Review Key Documents and production, pulling documents to be used for exhibits.
5/3/2018	Alan S. Gilbert	0.4			0.4		430	Review Simer declaration.
5/3/2018	Alan S. Gilbert	0.3			0.3		322.5	Conference K. Rodriguez re: hearing before magistrate.
5/3/2018	Alan S. Gilbert	0.3			0.3		322.5	Review order from magistrate and email re: same.
5/3/2018	Kristen C. Rodriguez	8.4	6.4				6,006.00	Work on summary judgment brief and related documents (6.0); prepare for and attend hearing (1.5); revise Simer declaration (0.4); draft updates to client (0.5).
5/3/2018	T. Carter. White	4.8		3.7	1.1		2,328.00	Review recent case filings and update from hearing (0.5); research use of personal testimony to establish materiality element (0.9); review and analyze audit medical records; assist K. Rodriguez with Edits to B. Simer declaration (0.3); compile exhibits for same (0.3); cite check statutory cites in brief against pre-2010 version of FCA (0.4); research case law showing public disclosure bar is analyzed on a case by case basis (0.7); research good SJ standard in S.D. Iowa and 8th Circuit, including J. Jarvey cases (0.8); research case law describing standard on cross motions for SJ (0.9).

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5/4/2018	T. Carter. White	2.8		2.8			1,358.00	Review and comment on summary of OCP claims (0.7); research 8th circuit law holding jurisdictional statutes are strictly construed (0.9); review and analyze prior decisions to determine which version of statute J. Jarvey uses (0.3); analyze claim forms and case law to determine if there is a basis for an express certification argument (0.9).
5/4/2018	Kristen C. Rodriguez	4.8	4.8				3,432.00	Work on summary judgment brief and related documents.
5/4/2018	Alan S. Gilbert	0.5					537.5	Emails re: discovery issues.
5/4/2018	Suzanne D. Smith	1					330	Review team email discussions regarding brief filing; Update shared drive to include additional dep pages and clean exhibits; Contact court reporter to order additional hearing transcript
5/4/2018	Jae K. Park	6.7	6.7				3,953.00	Further revise and supplement motion for summary judgment.
5/5/2018	Suzanne D. Smith	2					660	Review updated drafts of SJ filings; update table of contents and shared drive.
5/5/2018	T. Carter. White	4.9		4.9			2,376.50	Review and analyze prior briefing for references to FCA to confirm we have not waived argument as to applicability of older statute (0.4); analyze Iowa code for definition of order of a physician, "order," or physician (2.4); research updated Iowa citations on avoiding absurd interpretation of statute (1.2); research case law discussing reasonable interpretation argument (0.9).
5/6/2018	Tony K. Lu	2.7	2.7				1,080.00	Continue draft and revision of motion for summary judgment (2.7)
5/6/2018	T. Carter. White	3.75		3.75			1,818.75	Research case law holding violation of internal protocols does not give rise to FCA and FCA case law holding un-pled theories raised at summary judgment stage should not be considered.
5/7/2018	Tony K. Lu	5.2	3.5		2.2		2,080.00	Review and analyze protective order proposed by US government and identify additional protective orders for comparison (1.3); Revise statement of material facts to incorporate additional information from revised draft of summary judgment (1.7); Draft attorney declaration in support of motion for summary judgment (1.2); Update weekly agenda (.4); Revise JWU Affidavit in support of motion for summary judgment (.6)
5/7/2018	T. Carter. White	1.8		1.4			873	Review and analyze case law on government employee's testifying in personal capacity (0.8); research agency principles used by 8th Circuit (0.3); analyze support we have for the use of B. Simer testimony (0.3); prepare for call with J. Glazebrook re: B. Simer declaration (0.2); review analysis of requested changes to confidentiality order (0.2).
5/7/2018	Suzanne D. Smith	3.1					1,023.00	Prepare TOC for SJ filing; Update shared drive for appendix preparation.
5/7/2018	Kristen C. Rodriguez	4.8	4.8				3,432.00	Draft and revise motion for summary judgment.
5/7/2018	Alan S. Gilbert	0.3			0.3		322.5	E-mails regarding disclosure to feds.
5/8/2018	Ryan Aldrich	1.2					354	Assess, organize, and prepare data for load into review database; Draft and transmit specifications for same. .3 Finalize quality control process for new data set prior to releasing to case team; Update review database with tracking information; Draft and circulate status update and details for deliverable. .4 Prepare documents for production to opposing counsel, per T. Lu's request. .5
5/8/2018	Kristen C. Rodriguez	5	5				3,575.00	Draft and revise motion for summary judgment brief; conference with attorney for B. Seimer.
5/8/2018	Suzanne D. Smith	2.8					924	Participate in team call; Update shared drive to include hearing transcripts and other key pleadings.
5/8/2018	Tracy R. Myrick	0.8					140	Work with data set to import into review database according to established specifications; update search indexes as necessary and appropriate; perform data validation steps and document all relevant details.
5/8/2018	T. Carter. White	1			1		485	Prepare for and conference with J. Glazebrook regarding case background and B. Simer declaration; prepare for and have team call regarding case strategy and next steps.

Date	Name / Invoice Number	Hours	Plds, Mtn, Brief	Research	Investigation	Interviewing	Amount	Description
5/8/2018	Tony K. Lu	5			5		2,000.00	Continue review of PPFA S&Gs for production purposes pursuant to Order and service to opposing counsel re: same (1); Draft letter to counsel re: PPFA S&Gs. (.2); Plan and prepare for call with Steve King re: US Government intervention (.3); Provide additional feedback to motion for summary judgment and statement re claims (.5); Update weekly agenda (.2); Teleconference with Stephen Hill re: amendment to protective order and email Kristen Rodriguez re: same (.5); Participate in teleconference with team (.5); Draft emails to AUSA and client re: protective order (.4); Continue draft and review of affidavits in support of summary judgment to ensure exhibits are contained in document (1.4)
5/8/2018	Jae K. Park	5.7	4.7				3,363.00	Further revise and supplement motion for summary judgment (4.7); attend weekly team conference call regarding case status and strategy (1.0).
5/9/2018	Jae K. Park	0.8	0.8				472	Further revise and supplement sections of motion for summary judgment (0.5); conference with Relator's counsel regarding motion to file longer brief (0.2); communicate with team regarding same (0.1).
5/9/2018	T. Carter. White	2.1	1.8		0.3		1,018.50	Review and mark up latest draft of summary judgment brief (1.8); review response to NY FOIL request (0.3).
5/9/2018	Tony K. Lu	6.9	6.9				2,760.00	Continue draft and revision of summary judgment and reduction of pages (7.1); Continue draft and revision of affidavit in support of exhibits (.4)
5/9/2018	Kristen C. Rodriguez	6.2	6.2				4,433.00	Draft and edit summary judgment brief and supporting materials.
5/10/2018	Suzanne D. Smith	2.7					891	Review updated SJ papers, update shared drive to include additional exhibits and deposition pages
5/10/2018	Tony K. Lu	6.3	6.3				2,520.00	Continue draft and revision of statement of material facts (3); Teleconference with Kristen Rodriguez re: summary judgment (.4); Start draft of composite chart of medical records (.8); Continue draft and revision of affidavit supporting summary judgment (.9); Attention to appendix and table of contents -1.2
5/10/2018	T. Carter. White	5.9	4.7		1.2		2,861.50	Review and comment on latest version of SJ brief (3.0); research strategy for coordinating filing of SJ cover motion with motion for additional pages, including emails with local counsel (0.7); review and analyze local reviews for correct filing procedures and motion contents (0.5); revise cover motion based on same and comments from K. Rodriguez (0.3); review and analyze latest version of JWU declaration (0.2); analyze need for FOIA appeal (0.5); review revised NY FOIL request (0.7).
5/10/2018	Mary K. Ciziunas	0.9					265.5	Send a new FOIL request to the New York Office of Medicaid Inspector General per K. Rodriguez,
5/10/2018	Alan S. Gilbert	3	3				3,225.00	Review and edit summary judgment brief and conference with K. Rodriguez regarding same.
5/10/2018	Jae K. Park	4.4	4.4				2,596.00	Further revise and supplement motion for summary judgment (3.5); communicate regarding evidence supporting motion and preparation of appendix regarding 2006 audited files (0.9).
5/10/2018	Kristen C. Rodriguez	7	6.7		0.3		5,005.00	Work on summary judgment brief and ancillary filings (6.5); attention to correspondence regarding federal FOIA (0.3); attention to correspondence regarding declaration from B. Seimer (0.2).
5/11/2018	Kristen C. Rodriguez	6.5	6.5				4,647.50	Revise summary judgment briefs and related filings.
5/11/2018	Kristen C. Rodriguez	6.2	6				4,433.00	Work on summary judgment brief and statement of facts (6.0); call with client (0.2).
5/11/2018	Alan S. Gilbert	1.5					1,612.50	Attention to DOJ's requested expansion of protective order, including telephone conference with M. Falkstrom and J. Sandman and conferences with K. Rodriguez.
5/11/2018	Alan S. Gilbert	2.5	2.5				2,687.50	Attention to summary judgment brief, including revising introduction and conferences with K. Rodriguez.

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5/11/2018	Jae K. Park	3.5	3.5				2,065.00	Revise and supplement cover motion for summary judgment, motion to file under seal, and motion to file brief longer than 20 pages (2.5); conference with local counsel regarding filing procedures (0.5); review local rules regarding same (0.2); conference with team regarding status and strategy (0.3).
5/11/2018	T. Carter. White	1.7	1.7				824.5	Analyze strategy for additional FOIA request (0.3); team call regarding filing logistics (0.3); calls and emails with T. Lu and J. Park regarding motion for extension of pages and cover motion (0.5); revise motion for extension of pages (0.2); e-mail J. Glazebrook regarding finalizing B. Simer declaration (0.4).
5/11/2018	Tony K. Lu	5.7	5.7				2,280.00	Continue draft and revision of declaration and table of contents and prepare appendix (2); Continue draft and revision of declaration of Jennifer Warren Ulrick (.8); Continue draft and revision of composite chart of medical claims (.5); Continue draft and revision of statement of material facts (.6); Participate in teleconference with Mike Falkstrom (.6); Participate in teleconference with client (.6); Participate in teleconference with team re: summary judgment (.6)
5/12/2018	Tony K. Lu	1.5	1.5				600	Attention to and revise statement of material facts and provide additional material support to summary judgment (1.5)
5/12/2018	T. Carter. White	2.1	2.1				1,018.50	Review and revise B. Simer declaration based on her comments (0.3); forward exhibits (0.3); multiple emails with K. Rodriguez regarding edits to and support for public disclosure bar argument (0.5); supplemental research regarding same (0.8); draft insert to brief regarding implied certification theory (0.3).
5/12/2018	Alan S. Gilbert	0.2					215	E-mails K. Rodriguez regarding changes to protective order.
5/12/2018	Kristen C. Rodriguez	2.7	2.3				1,930.50	Revise summary judgment briefs and related filings (2.3); correspondence regarding amended protective order strategy (0.4).
5/13/2018	Kristen C. Rodriguez	7.5	7.5				5,362.50	Edit brief in support of motion for summary judgment and supporting filings.
5/14/2018	Kristen C. Rodriguez	7.8	7.8				5,577.00	Edit brief in support of motion for summary judgment and supporting filings.
5/14/2018	Jae K. Park	7.4	7.4				4,366.00	Attend weekly telephone conference regarding case status and strategy (1.3); review and revise latest draft of motion for summary judgment (4.0); prepare cover motion, motion to seal, and motion to file overlength brief (1.0); consider and analyze strategy for addressing materiality requirement (0.7); communicate with team regarding distinguishing express certification from implied certification claims (0.4).
5/14/2018	T. Carter. White	8	8				3,880.00	Review, analyze, proofread, and cite check revised summary judgment brief (6.2); revise cover motion based on comments from K. Rodriguez (0.3); revise motion for additional pages based on same (0.2); analyze whether specific representations necessary to support implied certification claim were made (0.5); coordinate execution of B. Simer declaration including calls with K. Rodriguez and J. Glazebrook (0.4); analyze additional considerations for same (0.4).
5/14/2018	Alan S. Gilbert	2	2				2,150.00	Review and edit summary judgment brief.
5/14/2018	Alan S. Gilbert	0.9	0.9				967.5	Conference with K. Rodriguez regarding summary judgment strategy and Simer declaration.
5/14/2018	Tony K. Lu	11.5	11.5				4,600.00	Continue draft and revision of statement of material facts and citations re: same (7.3); Participate in teleconference with team re: summary judgment (1.2); Draft declaration of counsel in support of summary judgment (1.6); Teleconference with K. Rodriguez re: summary judgment (.3); Revise draft of declaration of Jennifer Warren Ulrick (.2); Attention to and revise statement of material facts (.9)
5/14/2018	Suzanne D. Smith	3.1					1,023.00	Review brief materials, confirm complete appendix; Participate in weekly team call
5/15/2018	Suzanne D. Smith	5.1					1,683.00	Assist T. Lu with preparation of SJ filings.

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Date	Name / Invoice Number	Hours	Plds, Mtn, Brief	Research	Investigation	Interviewing	Amount	Description
5/15/2018	Tony K. Lu	12.4	12.4				4,960.00	Attention to citations in brief in support of summary judgment (3.5); Revise declaration of Jennifer Warren Ulrick (1.2); Continue draft revision and proofread of statement of material facts (5.4); Attention to electronic filing of documents (1.1); Teleconference with K. Rodriguez re: filings (.2); Draft and revise declaration in support of summary judgment (.9)
5/15/2018	Alan S. Gilbert	1.6	1.3				1,720.00	Review and edit Summary Judgment Brief (0.8); conferences with K. Rodriguez regarding same (0.5); conference with K. Rodriguez regarding proposed expansion of protective order (0.3).
5/15/2018	Kristen C. Rodriguez	12.5	10.9				8,937.50	Edit and finalize motion for summary judgment and supporting filings (10.9); call with AUSA regarding amendments to protective order and correspondence regarding same (0.5); call with PPFA counsel regarding same (0.4); edit and finalize supplemental response to document requests regarding PPFA S&Gs (0.7).
5/15/2018	T. Carter. White	3.2	3.2				1,552.00	Review and analyze updated draft of brief (0.8); provide advice regarding various citation and legal points in same (0.3); proofread final copy of brief (2.1).
5/16/2018	Alan S. Gilbert	1.5	1.5				1,612.50	Review plaintiff's motion for summary judgment.
5/16/2018	Kristen C. Rodriguez	0.6	0.6				429	Correspondence and analysis regarding plaintiff's filings.
5/16/2018	T. Carter. White	2.8	2.8				1,358.00	Review and analyze Plaintiff's SJ motion and brief supporting her SJ motion.
5/16/2018	Suzanne D. Smith	0.9					297	Download SJ filings (both parties), forward to team and add to shared drive for further review.
5/16/2018	Jae K. Park	1.3	1.3				767	Review and analyze Thayer's Motion for Summary Judgment and related papers (1.0); consider and analyze strategy for resistance (0.3).
5/17/2018	T. Carter. White	2.2	2.2				1,067.00	Review and analyze Plaintiff's statement of undisputed material facts (0.9); draft notes regarding key points in Plaintiff's brief and strategy for opposition (0.3); team call regarding strategy for opposition and reactions to Plaintiff's brief (1.0)
5/17/2018	Jae K. Park	1.2			1.2		708	Prepare for and participate in telephone conference with team regarding strategy for resistance to Thayer's motion for summary judgment.
5/17/2018	Suzanne D. Smith	0.8					264	Download SJ pleadings, add to shared drive and FileSite for further review by attorneys.
5/17/2018	Tony K. Lu	2.9	2.9				1,160.00	Participate in teleconference with team re: summary judgment filings (1.1); Attention to filings (.3); Review and analyze plaintiff's motion for summary judgment (.8); Draft and revise and file errata to certificate of service (.7)
5/17/2018	Alan S. Gilbert	1	1				1,075.00	Conference with Dentons team regarding response to plaintiff's summary judgment motion.
5/17/2018	Kristen C. Rodriguez	2.5	2.5				1,787.50	Review and analyze motion for summary judgment brief (1.1); attend team call regarding same (1.0); review errata sheet for certificate of service (0.4).
5/18/2018	Tony K. Lu	4.5	4.5				1,800.00	Start draft of response to 700+ paragraph statement of material facts by Plaintiff.
5/21/2018	Tony K. Lu	1	1				400	Continue draft of PPH Response to statement of material facts.
5/21/2018	T. Carter. White	5	4		1		2,425.00	Draft new federal FOIA request (1.0); revise outline of attack on Knau report based on review and analysis of Plaintiff's summary judgment brief and statement of undisputed facts (0.3); research caselaw holding expert testimony on credibility issues is inadmissible (1.8); research caselaw excluding expert testimony because of small sample size and discussing limitations of statistical extrapolation from small sample size (1.9).
5/21/2018	Kristen C. Rodriguez	0.3			0.3		214.5	Correspondence regarding FOIA request.
5/21/2018	Suzanne D. Smith	1					330	Update production spreadsheet
5/22/2018	Kristen C. Rodriguez	1.5					1,072.50	Attend team call (1.0); correspondence regarding B. Seimer declaration and revisions thereto. (0.5)

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Date	Name / Invoice Number	Hours	Plds, Mtn, Brief	Research	Investigation	Interviewing	Amount	Description
5/22/2018	T. Carter. White	4.3	0.4	2	0.7		2,085.50	Research privilege logs requirements in the FOIA context (.5); research case law refusing to allow expert testimony on what company's state of mind or what it would have done under hypothetical scenario (1.5); revise B. Simer declaration based on conversation with counsel (0.4); prepare for and have team call regarding summary judgment briefing (1.2); review and follow up on response to NY FOIL request (0.3); review and revise FOIA request (0.4).
5/22/2018	Tony K. Lu	3.6	2.1				1,440.00	Continue draft and revision of response to statement of material facts (2.1); Update task list (.4); Participate in teleconference with team (1.1)
5/22/2018	Jae K. Park	1.2					708	Prepare for and attend weekly team telephone conference.
5/22/2018	Suzanne D. Smith	1.9					627	Join weekly team call; Pull court filings, forward to team; Update shared drive headings for attorney review.
5/23/2018	Tony K. Lu	0.7	0.7				280	Continue draft of response to statement of material facts. (.7).
5/23/2018	Kristen C. Rodriguez	0.4	0.4				286	Call with T. Lu re: summary judgment.
5/23/2018	T. Carter. White	4.6	1.1	3.1	0.4		2,231.00	Revise B. Simer declaration based on team call on strategy (0.3); conference with M. Ciziunas regarding NY FOIL response (0.4); revise outline and shell motion attacking expert report based on review and analysis of prior research and expert report (0.8); research regarding expert testimony on what is typical in a fraud case (3.1).
5/23/2018	Jae K. Park	3.8	3.8				2,242.00	Work on outline for resistance to Thayer's motion for summary judgment.
5/24/2018	Tony K. Lu	6.5	6.5				2,600.00	Continue draft and revise response to statement of material facts (6.5)
5/24/2018	T. Carter. White	3.4			3.4		1,649.00	Revise B. Simer declaration (1.7); analyze need for deposition of W. Knau based on review and analysis of her report (1.4); circulate outline and shell motion to strike expert report (0.3).
5/24/2018	Jae K. Park	1.3	1.3				767	Continue working on outline for resistance to Thayer's motion for summary judgment.
5/24/2018	Kristen C. Rodriguez	1	1				715	Review affidavit for B. Seimer (0.2); Correspondence regarding SUF (0.1); call with A. Gilbert (0.7).
5/24/2018	Suzanne D. Smith	1.8					594	Download sealed filings, forward to opposing counsel and team for review; Update shared drive to include additional pleadings.
5/24/2018	Alan S. Gilbert	0.7	0.7				752.5	Conference with K. Rodriguez regarding strategy on summary judgment.
5/25/2018	Alan S. Gilbert	0.5	0.5				537.5	Review draft motion to strike Knau testimony and message to K. Rodriguez regarding same.
5/29/2018	T. Carter. White	2.7	2.7				1,309.50	Review and comment on draft outline of SJ resistance (0.7); team call regarding next steps for summary judgment briefing(0.5); call and e-mail J. Glazebrook regarding B. Simer declaration (0.4); begin drafting section on counter-statement of material facts (1.1).
5/29/2018	Jae K. Park	1	1				590	Prepare for and attend telephone conference with team regarding strategy for finalizing resistance to Thayer's summary judgment (0.5); email exchange regarding same (0.5).
5/29/2018	Tony K. Lu	0.7	0.7				280	Participate in team meeting re: discussion about summary judgment (.5); Attention to and update weekly task list (.2)
5/29/2018	Kristen C. Rodriguez	1	1				715	Prepare for and attend team meeting.
5/29/2018	Suzanne D. Smith	0.9					297	Participate in team call; Pull and circulate recently filed Motion; File accordingly
5/30/2018	Cicely R. Miltich	1.5					750	Review motions for summary judgment and motion for leave to amend protective order
5/30/2018	Jae K. Park	5	5				2,950.00	Work on resistance to Thayer's motion for summary judgment (4.6); telephone conference regarding same (0.4).
5/30/2018	Kristen C. Rodriguez	1.5	1.5				1,072.50	Review and analyze summary judgment outline (1.0); call with J. Park re: same (0.5)
5/30/2018	T. Carter. White	6.8	6.8				3,298.00	Start drafting motion to exclude expert testimony of W. Knau, including sections addressing impermissible legal opinions, opinions on organizational state of mind, and statistical sampling (5.5); continue drafting response to Plaintiff's statement of undisputed facts (1.3).
5/31/2018	Jae K. Park	5.9	5.9				3,481.00	Continue working on resistance to Thayer's motion for summary judgment; telephone conference with Ms. Kristen Rodriguez regarding same.

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Date	Name / Invoice Number	Hours	Plds, Mtn, Brief	Research	Investigation	Interviewing	Amount	Description
5/31/2018	Alan S. Gilbert	0.5					537.5	Conference with K. Rodriguez regarding protective order and summary judgment response.
5/31/2018	Kristen C. Rodriguez	1					715	Analysis regarding response to motion to amend protective order with C. Miltich and A. Gilbert.
5/31/2018	Cicely R. Miltich	3.3					1,650.00	Confer with K. Rodriguez regarding response to United State's motion to amend protective order; research case law regarding United State's standing to amend protective order and authority for DOJ sharing confidential information with other governmental agencies
5/31/2018	T. Carter. White	3.9	3.9				1,891.50	Continue drafting motion attacking expert report, including sections arguing Knau's ipse dixit and that her review, summary, and weighing of the evidence are impermissible (2.4); continue drafting response to Plaintiff's statement of undisputed facts (1.0); review and analyze articles regarding billing errors (0.3); review and analyze statements of undisputed material facts (0.2).
6/1/2018	Jae K. Park	6.50	6.50				\$ 3,835.00	Work on Resistance to Thayer's Motion for Partial Summary Judgment.
6/1/2018	T. Carter. White	4.70	4.70				\$ 2,279.50	Revise and circulate motion to exclude expert testimony (3.7); continue drafting response to Plaintiff's statement of undisputed facts (1.0).
6/1/2018	Cicely R. Miltich	1.50					\$ 750.00	Confer with K. Rodriguez regarding United States' motion to amend protective order; research case law regarding motions to amend protective orders in FCA context and standing for intervention
6/1/2018	Kristen C. Rodriguez	0.20					\$ 143.00	Work on protective order amendment response.
6/2/2018	Cicely R. Miltich	2.30					\$ 1,150.00	Draft outline of memorandum in opposition to United States' motion to amend agreed protective order
6/3/2018	Jae K. Park	5.80	5.80				\$ 3,422.00	Continue working on Resistance to Thayer's Motion for Partial Summary Judgment.
6/3/2018	Kristen C. Rodriguez	2.80	1.80				\$ 2,002.00	Work on protective order amendment motion (1.0); review and revise motion for summary judgment response outline (1.8).
6/4/2018	Kristen C. Rodriguez	3.50	1.00				\$ 2,502.50	Lead team meeting (0.5); Correspondence regarding summary judgment briefing (0.5); Work on protective order amendment brief (2.5).
6/4/2018	Cicely R. Miltich	3.70					\$ 1,850.00	Research case law regarding DOJ's legal obligations to share information with government agencies and standard for granting motions to amend protective order; draft memorandum in opposition to motion to amend protective order
6/4/2018	Noor-ul-ain Hasan	0.50					\$ 167.50	Reviewed the plaintiff's brief on a preliminary read.
6/4/2018	Jae K. Park	7.20	6.70				\$ 4,248.00	Continue working on Resistance to Thayer's Motion for Partial Summary Judgment (5.7); prepare for and attend weekly team status and strategy telephone conference (0.5).
6/4/2018	Tony K. Lu	0.60					\$ 240.00	PPH: update weekly task list and participate in weekly teleconference (.6)
6/4/2018	T. Carter. White	3.60	1.00	1.40			\$ 1,746.00	Research standard for evaluating expert testimony in the context of summary judgment motions (1.4); complete first draft of relevant responses to Plaintiff's undisputed statement of material facts (1.0); prepare for and have team call regarding case status, strategy, and next steps (0.5); review and comment on outline of opposition to motion to modify protective order (0.7).
6/5/2018	Alan S. Gilbert	1.00					\$ 1,075.00	Review draft response to DOJ motion to amend protective order (0.5) and e-mails and telephone conference with K. Rodriguez regarding same (0.5).
6/5/2018	Noor-ul-ain Hasan	2.00					\$ 670.00	Read through the plaintiff's and defendant's brief in their entirety--annotating the relevant provisions and outlining key issues in the case.
6/5/2018	Noor-ul-ain Hasan	2.50					\$ 837.50	Conducted research to respond to plaintiff's motion to amend protective order, outlined potential authorities and delivered findings to the Partner.
6/5/2018	Noor-ul-ain Hasan	0.40					\$ 134.00	Met with Partner to discuss overview of case and expectations for the project. Received initial assignments.
6/5/2018	Noor-ul-ain Hasan	1.00					\$ 335.00	Conducted research to determine the incentive of a plaintiff seeking partial summary judgment on an affirmative defense.

Date	Name / Invoice Number	Hours	Plds, Mtn, Brief	Research	Investigation	Interviewing	Amount	Description
6/5/2018	Kristen C. Rodriguez	3.10					\$ 2,216.50	Review and revise response to protective order motion (2.7); conference with N. Hasan regarding case overview (0.4).
6/5/2018	Cicely R. Miltich	3.80					\$ 1,900.00	Draft memorandum in opposition to motion to amend protective order; confer with K. Rodriguez regarding draft memorandum
6/6/2018	Cicely R. Miltich	4.10					\$ 2,050.00	Revise memorandum in opposition to motion to amend protective order; revise, finalize, and file memorandum in opposition to motion to amend protective order; confer with K. Rodriguez regarding revisions to opposition memorandum
6/6/2018	Kristen C. Rodriguez	6.40					\$ 4,576.00	Draft and revise opposition to motion to amend protective order.
6/6/2018	Alan S. Gilbert	1.50					\$ 1,612.50	Review and edit draft response to DOJ motion to modify protective order.
6/6/2018	T. Carter. White	0.30	0.30				\$ 145.50	Review updates regarding NY FOIL request (0.1); email regarding B. Simer declaration (0.2).
6/6/2018	Noor-ul-ain Hasan	2.00					\$ 670.00	Conducted research on applicable caselaw to defeat DOJ's motion to amend protective order, produced a memo, and shared findings with Partner.
6/6/2018	Noor-ul-ain Hasan	0.20					\$ 67.00	After completing first round of cite-checks, met briefly with associate to get clarification on specific cases.
6/6/2018	Noor-ul-ain Hasan	1.00					\$ 335.00	Completed cite-checking assignment for pages 1 through 6 of the brief -- including applicable Bluebook rules, Lexis/Westlaw cross-checking.
6/6/2018	Noor-ul-ain Hasan	1.80					\$ 603.00	Completed remaining cite-checking and Lexis/Westlaw cross-checking of cases for pages 7 through 21.
6/6/2018	Noor-ul-ain Hasan	0.10					\$ 33.50	Spoke on the phone with Partner to review framing of particular paragraph in the brief.
6/6/2018	Noor-ul-ain Hasan	0.20					\$ 67.00	Reviewed Partner's changes to a specific paragraph in the brief and spoke on the phone with Partner to finalize the language.
6/6/2018	Noor-ul-ain Hasan	1.00					\$ 335.00	After receiving further direction from the Partner, I completed a more substantive inquiry into the authorities cited.
6/6/2018	Noor-ul-ain Hasan	0.10					\$ 33.50	Briefly met with another associate to understand cite-checking assignment for brief.
6/7/2018	Wanda N. Hulsebus	0.20					\$ 26.00	Research and obtain FEDERAL PRACTICE & PROCEDURE: JURISDICTION 2D § 4432 for K. Rodriguez.
6/7/2018	Kristen C. Rodriguez	1.50	1.50				\$ 1,072.50	Work on resistance to plaintiff's motion; correspondence with client and PPFA regarding motion to amend protective order.
6/7/2018	T. Carter. White	4.10	3.30				\$ 1,988.50	Review and analyze opposition to motion to modify protective order (0.8); prepare for and call with K. Rodriguez to address issues regarding response to Plaintiff's facts (0.5); review and analyze local rules regarding response to statement of undisputed material facts (0.3); revise responses to undisputed facts based on comments from K. Rodriguez and review of relevant factual documents including deposition testimony and medical records (2.5).
6/7/2018	Noor-ul-ain Hasan	0.10					\$ 33.50	Responded to Partner e-mail with updates for reply brief for partial summary judgment.
6/7/2018	Noor-ul-ain Hasan	0.50					\$ 167.50	Reviewed cite-checking assignment ahead of feedback meeting with Partner.
6/7/2018	Noor-ul-ain Hasan	0.30					\$ 100.50	Tracked down specific treatise not available on Lexis by working with Lexis rep and then finally retrieving the treatise from Westlaw rep.
6/7/2018	Noor-ul-ain Hasan	0.60					\$ 201.00	Drafted initial findings of Eighth Circuit partial summary judgment and preclusion and completed bluebooking.
6/7/2018	Noor-ul-ain Hasan	1.00					\$ 335.00	Conducted research on Eighth Circuit view of preclusion for partial summary judgment.
6/7/2018	Jae K. Park	5.50	5.00	0.50			\$ 3,245.00	Continue working on resistance to Thayer's motion for partial summary judgment (3.5); research law on effect of partial judgment, definition of "material fact" (0.5) work on response to Thayer's separate statement of undisputed material facts (1.5).
6/7/2018	Noor-ul-ain Hasan	0.20					\$ 67.00	Spoke on the phone with other Associate on the project to get perspective on Eighth Circuit decision regarding preclusion of affirmative defenses upon successful partial summary judgment motion.
6/7/2018	Cicely R. Miltich	0.20					\$ 100.00	Review correspondence regarding filed opposition to motion to amend protective order

Date	Name / Invoice Number	Hours	Plds, Mtn, Brief	Research	Investigation	Interviewing	Amount	Description
6/8/2018	Tony K. Lu	0.70	0.70				\$ 280.00	Attention to, review, and revise statement of material facts in response to plaintiff's cross motion (.7)
6/8/2018	Jae K. Park	6.70	6.70				\$ 3,953.00	Continue working on resistance to Thayer's motion for partial summary judgment
6/8/2018	T. Carter. White	3.80	3.80				\$ 1,843.00	Revise responses to undisputed facts based on comments from K. Rodriguez and review of relevant factual documents including deposition testimony and medical records (3.3); email J. Park regarding same (0.2); finalize and circulate draft of same (0.3).
6/8/2018	Noor-ul-ain Hasan	0.60					\$ 201.00	After presenting research findings to Partner, I drafted a short paragraph to enter into the Brief.
6/8/2018	Noor-ul-ain Hasan	0.10					\$ 33.50	Conferred with another Associate on Bluebooking question for the paragraph for the Reply brief, resolved the issue, and shared with the Partner.
6/8/2018	Noor-ul-ain Hasan	0.30					\$ 100.50	Phone call with Partner to review cite-checking issues and received feedback for future assignments.
6/8/2018	Noor-ul-ain Hasan	0.30					\$ 100.50	Reviewed Bluebooking cite checks ahead of meeting with Partner.
6/8/2018	Noor-ul-ain Hasan	0.30					\$ 100.50	Collected feedback on paragraph for reply brief from other associate and incorporated changes.
6/8/2018	Kristen C. Rodriguez	0.30	0.30				\$ 214.50	Correspondence regarding resistance to plaintiff's motion.
6/10/2018	Tony K. Lu	1.40	1.40				\$ 560.00	Review protocols for purposes of answering questions pertaining to statement of material facts (1.4)
6/10/2018	Jae K. Park	2.40	2.40				\$ 1,416.00	Continue working on resistance to Thayer's motion for partial summary judgment.
6/10/2018	Kristen C. Rodriguez	6.00	6.00				\$ 4,290.00	Work on resistance to plaintiff's motion.
6/10/2018	Suzanne D. Smith	1.00					\$ 330.00	Review recent filings, download, send to team and file in shared drive for further review.
6/11/2018	Jae K. Park	9.40	8.00				\$ 5,546.00	Continue working on resistance to Thayer's motion for partial summary judgment (3.2); prepare for and attend weekly team call (1.4); prepare separate statement of additional facts in support of resistance (2.9); communicate with R. Hixon regarding overlength brief (0.3); multiple conferences and communications with K. Rodriguez regarding strategy (1.6).
6/11/2018	Kristen C. Rodriguez	13.00	11.80				\$ 9,295.00	Revise summary judgment resistance (11.5); attend team call (1.2); conference with N. Hasan regarding motions and task list (0.3).
6/11/2018	Tony K. Lu	4.50	2.70				\$ 1,800.00	Participate in teleconference with team and additional communications with local counsel (1.6); Update and revise agenda (.2); Continue draft and revision of statement of material facts (2.7)
6/11/2018	T. Carter. White	7.10	5.10		0.40		\$ 3,443.50	Review and respond to communications from DOJ regarding FOIA request (0.4); conference with T. Lu regarding responses to undisputed facts (0.3); compile additional factual cites to be included in supplemental appendix (1.8); compile additional facts needed in supplemental JWU declaration (2.0); revise motion to exclude expert testimony to convert it into short insert into SJ opposition brief (1.0); conference with K. Rodriguez regarding same (0.2); prepare for and have team call regarding SJ strategy and next steps (1.4).
6/11/2018	Suzanne D. Smith	1.80					\$ 594.00	Prepare deposition pages as exhibits to SJ response pleading (.2); Pull interrogatory response for exhibit to SJ response (0.4); Participate in weekly team call (1.2).
6/11/2018	Noor-ul-ain Hasan	0.10					\$ 33.50	Read and responded to Kristen's e-mail regarding Iowa statute research.
6/11/2018	Noor-ul-ain Hasan	0.10					\$ 33.50	Brief call with Westlaw to discuss where to find treatise relevant to Iowa statute research.
6/11/2018	Noor-ul-ain Hasan	0.30					\$ 100.50	Brief meeting with another Associate to discuss how to frame string cite in Iowa statute research as well as relevance and usefulness of treatise.
6/11/2018	Noor-ul-ain Hasan	0.30					\$ 100.50	Re-read cases relevant to earlier Iowa statutory research and responded to Partner with further recommendations for revision.
6/11/2018	Noor-ul-ain Hasan	0.30					\$ 100.50	Updated final Iowa statutory research findings and shared with Partner.
6/11/2018	Noor-ul-ain Hasan	1.40					\$ 469.00	Conducted research on Iowa statutory amendments for MSJ brief and shared initial findings with Partner.
6/11/2018	Noor-ul-ain Hasan	0.50					\$ 167.50	Edited Motions for June 15th filing.

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Date	Name / Invoice Number	Hours	Plds, Mtn, Brief	Research	Investigation	Interviewing	Amount	Description
6/11/2018	Noor-ul-ain Hasan	0.40					\$ 134.00	Made updates to string citation per feedback from Partner re: Iowa statutory research.
6/11/2018	Noor-ul-ain Hasan	1.20					\$ 402.00	Attended weekly team status call - took notes and participated.
6/11/2018	Noor-ul-ain Hasan	0.30					\$ 100.50	Spoke with Partner on the phone about Task List, Iowa statutory research, and Motion drafting.
6/11/2018	Noor-ul-ain Hasan	0.30					\$ 100.50	Updated and revised task list per Partner feedback.
6/12/2018	Jae K. Park	4.50	4.50				\$ 2,655.00	Continue working on separate statement of additional facts in support of resistance to Thayer's motion for partial summary judgment.
6/12/2018	Tony K. Lu	1.60	1.60				\$ 640.00	Teleconference with Stan Thompson re: response to statement of material facts and internal email re: same (.6); Continue draft of statement of material fact responses (1)
6/12/2018	Noor-ul-ain Hasan	0.50					\$ 167.50	Shared draft of Motion to File Under Seal and Motion to File a Brief in Excess of 30 Pages with Managing Associate, received feedback, and made changes.
6/12/2018	Noor-ul-ain Hasan	0.20					\$ 67.00	Made changes to brief based on Managing Associate feedback and shared final version with Partner.
6/12/2018	Kristen C. Rodriguez	6.40	6.40				\$ 4,576.00	Revise summary judgment resistance.
6/12/2018	T. Carter. White	3.10	3.10				\$ 1,503.50	Review and comment on motion to file under seal and motion for additional pages (0.3); revise argument attacking expert report based on comments from K. Rodriguez (1.8); analyze case law regarding statistical sampling and extrapolation for use in liability or damages (1).
6/12/2018	Noor-ul-ain Hasan	0.40					\$ 134.00	Conferred with Managing Associate on outstanding changes to two Motions and shared updates with Partner.
6/13/2018	Alan S. Gilbert	1.80	1.80				\$ 1,935.00	Review draft summary judgment response (1.5) and conference with K. Rodriguez regarding same (0.3).
6/13/2018	Kristen C. Rodriguez	10.30	9.70				\$ 7,364.50	Revise summary judgment resistance (3.4); draft portions of responses to plaintiff's statement of undisputed facts (5.7); conference with A. Gilbert (0.3); conference with C. White (0.3); Review DOJ's reply in support of amendment to protective order (0.6)
6/13/2018	Tony K. Lu	4.70	3.60	1.10			\$ 1,880.00	Continue draft and revision of response to statement of facts (3.6); COnduct legal research on admissibility of expert opinion per Rule 56.1 (1.1)
6/13/2018	T. Carter. White	5.40	5.40				\$ 2,619.00	Supplemental research regarding case law supporting our position that limited evidence is insufficient to create a genuine issue of material fact (1.6); draft inserts to brief regarding expert evidence is insufficient (0.9); multiple calls and emails checking on status of B. Simer declaration (0.6); review and revise brief based on comments from K. Rodriguez (0.5); review and comment on current draft of brief (0.3); multiples calls and emails to other team members regarding harmonizing facts section (0.7); revise brief based on my review and A. Gilbert's comments (0.8).
6/13/2018	Noor-ul-ain Hasan	1.20					\$ 402.00	Conducted research on Iowa "plain meaning" approach to reading a statute and synthesized parenthetical options for Brief.
6/13/2018	Noor-ul-ain Hasan	0.10					\$ 33.50	Made update to Motions re: overlength resistances.
6/13/2018	Noor-ul-ain Hasan	0.20					\$ 67.00	Double-checked Bluebooking on parenthetical options for Iowa "plain meaning" cases.
6/13/2018	Jae K. Park	8.50	8.50				\$ 5,015.00	Continue working on resistance to Thayer's motion for partial summary judgment (4.6); revise and update separate statement of additional material facts (2.2); identify documents for supplemental appendix (0.7); other miscellaneous tasks related to resistance (1.0).
6/14/2018	Jae K. Park	11.40	11.40				\$ 6,726.00	Continue working on resistance to Thayer's motion for partial summary judgment.
6/14/2018	Cicely R. Miltich	0.60					\$ 300.00	Review and analyze United States' reply in support of motion to amend protective order; summarize errors in United States' reliance on Eisenstein to support standing argument

Date	Name / Invoice Number	Hours	Plds, Mtn, Brief	Research	Investigation	Interviewing	Amount	Description
6/14/2018	Kristen C. Rodriguez	12.20	12.20				\$ 8,723.00	Revise brief and ancillary summary judgment resistance filings (5.8); calls with team regarding same (0.5); Draft responses to statement of undisputed facts submitted by plaintiff (5.9).
6/14/2018	T. Carter. White	13.40	12.90				\$ 6,499.00	Review and analyze Gov'ts reply in support of motion to modify protective order (0.5); review and revise responses to statement of undisputed facts based on comments from K. Rodriguez (2.6); work on finalizing B. Simer declaration (0.7); work on finalizing supplemental appendix (1.2); revise brief to include harmonized factual citations (1.4); supplemental research on various topics including materiality and add in good citations into brief (3.1); proofread brief (1.1); draft additional responses to plaintiff's statement of undisputed facts to complete document (0.8); draft model responses for responses to plaintiff's facts involving extra cycles (0.6); add in and correct all factual citations in brief (0.7); incorporate comments from others into brief (0.4); make suggestions regarding additions to appendix and our additional facts (0.3).
6/14/2018	Tony K. Lu	3.60	3.50				\$ 1,440.00	Draft supplemental declaration of Jennifer Warren Ulrick in support of opposition to statement of facts (.6); Continue draft and revision of response to statement of material facts (1.3); Teleconference with K. Rodriguez re: filings (.1); Review and analyze response to motion for summary judgment (1.2); Miscellaneous assistance for authenticating documents (.4)
6/14/2018	Noor-ul-ain Hasan	1.70					\$ 569.50	Substantively reviewed the Resistance Brief for case law support, proofing, and cite checking.
6/14/2018	Noor-ul-ain Hasan	0.10					\$ 33.50	Discussed Brief edits and touched based on activities for Friday prior to filing with Partner.
6/14/2018	Noor-ul-ain Hasan	0.10					\$ 33.50	Spoke on the phone with Associate in charge of Brief edits to touch base on Brief editing strategy.
6/14/2018	Noor-ul-ain Hasan	0.20					\$ 67.00	Made updates to Motions that are due tomorrow (Motion for Leave to File Under Seal and Motion to File Brief in Excess of 20 Pages).
6/14/2018	Noor-ul-ain Hasan	1.70					\$ 569.50	Reviewed Statement of Undisputed Facts proofs that the other two Associates completed.
6/14/2018	Noor-ul-ain Hasan	2.40					\$ 804.00	Reviewed Facts 101 - 300 for Statement of Undisputed Facts and made grammar proofing edits and citation edits.
6/14/2018	Noor-ul-ain Hasan	0.50					\$ 167.50	Reviewed Resistance brief for grammar errors in Argument section.
6/14/2018	Noor-ul-ain Hasan	0.50					\$ 167.50	Initiated Statement of Undisputed Facts review assignment by reading through the document and making initial grammar proofing edits. Also had a 5 minute phone call with Partner to double check on expectations for assignment.
6/14/2018	Alan S. Gilbert	3.50	3.50				\$ 3,762.50	Review and edit draft response to plaintiff's summary judgment motion.
6/14/2018	Suzanne D. Smith	4.10					\$ 1,353.00	Assist with preparation of SJ response filing
6/15/2018	Suzanne D. Smith	3.50					\$ 1,155.00	Assist with SJ response filing (3.0); Participate in team call (0.5).
6/15/2018	Kristen C. Rodriguez	10.90	10.90				\$ 7,793.50	Edit and finalize summary judgment response brief and related filings.
6/15/2018	Noor-ul-ain Hasan	0.50					\$ 167.50	Completed grammar proofing and cite checking for Separate Statement in Support of Resistance to Plaintiff's Motion for Summary Judgment.
6/15/2018	Noor-ul-ain Hasan	1.00					\$ 335.00	Corrected Statement of Undisputed Fact OCR-transfer errors with proper images after completing screenshot and track changes.
6/15/2018	Noor-ul-ain Hasan	1.30					\$ 435.50	Ran final edits on the Resistance to Plaintiff's Motion for Summary Judgment.
6/15/2018	Noor-ul-ain Hasan	0.10					\$ 33.50	Discussed edits to Resistance Brief with Partner.

Date	Name / Invoice Number	Hours	Plds, Mtn, Brief	Research	Investigation	Interviewing	Amount	Description
6/15/2018	T. Carter. White	9.70	9.70				\$ 4,704.50	Communications with opposing counsel regarding resistance brief filing (0.3); team call regarding strategy and logistics for filing resistance (0.5); input additional factual cites and edits from others into brief (2.6); revise responses to Plaintiff's facts to conform to model answers (1.4); add and revise factual cites in master version of responses to Plaintiff's facts to make sure we had all necessary citations and they were consistent (2.2); provide analysis and advice regarding brief based on review of various evidence (0.7); revise brief based on close proofread (1.8); assist with finalizing documents and preparing them filing (.2).
6/15/2018	Tony K. Lu	9.10	9.10				\$ 3,640.00	Attention and revise Statement of material facts and other items for filing of summary judgment motion (8.6); Participate in teleconference with team re: summary judgment (0.5).
6/15/2018	Noor-ul-ain Hasan	0.20					\$ 67.00	Conferred with Partner and Associates on options for replacing original tables in Statement of Undisputed Facts with replicas from Plaintiff's brief or correcting our own tables.
6/15/2018	Noor-ul-ain Hasan	1.50					\$ 502.50	Proofing Statement of Undisputed Facts for image blurriness and screenshotting replacements.
6/15/2018	Noor-ul-ain Hasan	1.30					\$ 435.50	Conducted final proofing of Statement of Undisputed Facts No. 500 onward.
6/15/2018	Alan S. Gilbert	0.30	0.30				\$ 322.50	E-mails regarding plaintiffs not filing documents under seal.
6/15/2018	Jae K. Park	10.70	10.70				\$ 6,313.00	Continue working on resistance to Thayer's motion for partial summary judgment.
6/16/2018	Kristen C. Rodriguez	1.90	1.90				\$ 1,358.50	Call with C. White regarding reply (0.4); Review Thayer's resistance (0.8); follow up correspondence with C. White (0.7).
6/16/2018	Suzanne D. Smith	0.60					\$ 198.00	Download recent filings (.3); distribute to team, load into shared drive for further review (0.3).
6/16/2018	T. Carter. White	9.80	9.80				\$ 4,753.00	Review and analyze Relator's resistance to PPH's MSJ (1.0); create strategy and outline reply brief (0.8); conference with K. Rodriguez regarding issues in Relator's resistance and strategy for reply (0.4); begin drafting reply; analyze and research potential bases for maintaining PDB argument (7.5).
6/17/2018	Suzanne D. Smith	0.60					\$ 198.00	Download additional filings (0.3); convert for shared drive, distribute to team for review (0.3).
6/17/2018	Jae K. Park	0.60	0.60				\$ 354.00	Review Thayer's resistance to motion for summary judgment.
6/18/2018	T. Carter. White	9.20	9.20				\$ 4,462.00	Continue drafting reply in further support of motion for summary judgment, including supplemental research and review of various summary judgment memoranda and factual documents (7.5); review and revise same (1.2); team strategy call (0.5).
6/18/2018	Alan S. Gilbert	0.30	0.30				\$ 322.50	Conference with K. Rodriguez regarding relators' response and time for filing reply.
6/18/2018	Noor-ul-ain Hasan	0.20					\$ 67.00	Spoke on the phone with another Associate on the project to discuss strategy for research on discovery/jurisdictional issue.
6/18/2018	Noor-ul-ain Hasan	0.20					\$ 67.00	Conferred with Partner on clarifying Research search regarding: discovery and jurisdictional issue.
6/18/2018	Noor-ul-ain Hasan	0.20					\$ 67.00	Spoke on the phone with Research Attorney help desk to enhance search for discovery/jurisdictional issue.
6/18/2018	Noor-ul-ain Hasan	0.30					\$ 100.50	Spoke on the phone with Partner about research assignments for the Reply Brief that is due on June 22.
6/18/2018	Noor-ul-ain Hasan	2.00					\$ 670.00	Conducted research on issue pertaining to discovery and summary judgment. Shared findings with team.
6/18/2018	Noor-ul-ain Hasan	0.20					\$ 67.00	Conferred with other associate on research findings before outlining next steps.
6/18/2018	Noor-ul-ain Hasan	0.40					\$ 134.00	Attended team status meeting and took notes.
6/18/2018	Noor-ul-ain Hasan	1.00					\$ 335.00	Completed remaining research on Discovery Issue after first round of findings did not include binding law from our Circuit.
6/18/2018	Noor-ul-ain Hasan	1.30					\$ 435.50	Conducted research on Iowa statutory amendments for reply brief.
6/18/2018	Noor-ul-ain Hasan	0.10					\$ 33.50	Updated Task List for the week.
6/18/2018	Noor-ul-ain Hasan	0.40					\$ 134.00	Synthesized research findings into e-mail for the team.

Time Entry Records in
United States ex rel. Thayer v. Planned Parenthood of the Heartland

Date	Name / Invoice Number	Hours	Plds, Mtn, Brief	Research	Investigation	Interviewing	Amount	Description
6/18/2018	Tony K. Lu	1.10	1.10				\$ 440.00	Meet and confer with PPH team for weekly meeting and draft emails to opposing counsel re: briefing extension (.9) ; teleconference with K. Rodriguez re: reply to summary judgment brief (.2)
6/18/2018	Suzanne D. Smith	1.80					\$ 594.00	Attend weekly team meeting (0.4); Review pleadings, forward specifically requested documents to team for review (1.4).
6/18/2018	Kristen C. Rodriguez	2.90	2.90				\$ 2,073.50	Attend team meeting (0.5); call with N. Hasan regarding research for reply brief (0.3); various correspondence regarding unsealed brief issues (0.6); Conference with local counsel (0.5); Draft responses to opposing counsel's emails regarding sealing and extension (0.4); review research for reply (0.6).
6/19/2018	Kristen C. Rodriguez	4.30	4.30				\$ 3,074.50	Draft and revise reply brief in support of summary judgment brief.
6/19/2018	Suzanne D. Smith	0.90					\$ 297.00	Review discovery responses, forward to attorney for review in preparation of adding to appendix
6/19/2018	Noor-ul-ain Hasan	0.10					\$ 33.50	Reviewed notes from previous day's meeting with Partner to outline strategy for research on discovery/jurisdictional issue.
6/19/2018	Noor-ul-ain Hasan	2.70					\$ 904.50	Conducted research on discovery/jurisdictional issue and conferred with research attorney help desk to enhance search. Shared findings with Partner.
6/19/2018	Noor-ul-ain Hasan	0.20					\$ 67.00	Reviewed feedback on Motion to Strike from Associate.
6/19/2018	Noor-ul-ain Hasan	0.60					\$ 201.00	Conferred with paralegal on locating appendix documents and identified new documents that need to be added into Supplemental Appendix.
6/19/2018	Noor-ul-ain Hasan	0.10					\$ 33.50	Spoke on the phone with Partner about research that did not lead to any findings and took direction on next steps.
6/19/2018	Noor-ul-ain Hasan	0.90					\$ 301.50	Made updates to Motion to Strike after finding research that supported proposition stated in introduction paragraph.
6/19/2018	Tony K. Lu	4.50	4.50				\$ 1,800.00	Draft Statement of material facts supplemental responses (4.5)
6/19/2018	T. Carter. White	6.40	6.40				\$ 3,104.00	Research regarding burden of proving disclosures to government under original source inquiry (0.8); research inability to use privilege as both a sword and a shield (0.7); research regarding direct and voluntary knowledge prong of original source inquiry (0.7); research regarding consequences for not making discovery disclosure (0.8); review and revise motion to strike letter (0.6); call with K. Rodriguez regarding comments to SJ reply (0.3); revise SJ reply in accordance with same, additional research, and review of Thayer's factual responses (1.8); review and analyze case law cited by Thayer for ways to distinguish (0.7).
6/19/2018	Jae K. Park	0.70	0.70				\$ 413.00	Review and analyze draft Reply to Thayer's Resistance to Planned Parenthood's Motion for Summary Judgment (0.5); prepare comments regarding same (0.2).
6/19/2018	Alan S. Gilbert	0.70	0.70				\$ 752.50	Review plaintiff's response to motion for summary judgment.
6/19/2018	Noor-ul-ain Hasan	1.60					\$ 536.00	Drafted Motion to Strike.
6/20/2018	Tony K. Lu	2.60	2.60				\$ 1,040.00	Continue draft and revision of reply to resistance to statement of fact (2.6)
6/20/2018	Noor-ul-ain Hasan	0.10					\$ 33.50	Shared update on Motion to Strike with Associate and collected information on remaining research needs.
6/20/2018	Noor-ul-ain Hasan	0.20					\$ 67.00	Read through Associate's feedback on Motion to Strike and cross-referenced notes.
6/20/2018	Noor-ul-ain Hasan	1.20					\$ 402.00	Made updates to Motion to Strike and checked bluebooking edits.
6/20/2018	Noor-ul-ain Hasan	0.30					\$ 100.50	Reviewed local rules to determine if there would be any issues with the appendix or exhibits.
6/20/2018	Noor-ul-ain Hasan	0.10					\$ 33.50	Spoke on the phone with Partner on feedback for Motion to Strike and adjusted approach to research.
6/20/2018	Noor-ul-ain Hasan	0.50					\$ 167.50	Made updates to Motion to Strike.
6/20/2018	Noor-ul-ain Hasan	0.40					\$ 134.00	Researched options instead of Motion to Strike and shared findings with Partner.
6/20/2018	Noor-ul-ain Hasan	0.40					\$ 134.00	Reviewed Court Order and case involving 37(c) sanctions to determine if there is a better course of action than Motion to Strike.

Date	Name / Invoice Number	Hours	Plds, Mtn, Brief	Research	Investigation	Interviewing	Amount	Description
6/20/2018	Noor-ul-ain Hasan	1.40					\$ 469.00	Drafted memo for Reply Brief as a replacement for Motion to Strike and shared with team.
6/20/2018	Noor-ul-ain Hasan	0.10					\$ 33.50	Looked at Local Rules to determine if there would be any issues with length of Reply Brief.
6/20/2018	Noor-ul-ain Hasan	0.90					\$ 301.50	Drafted Motion to File Under Seal/Motion to File Overlength Brief and shared with team.
6/20/2018	T. Carter. White	5.60	5.60				\$ 2,716.00	Revise reply brief based on comments from K. Rodriguez, A. Gilbert, and J. Park, review of factual records, and supplemental research (4.3); review and comment on draft motion to strike (0.8); analyze strategy for arguments to include in reply based on review of supplemental research (0.5).
6/20/2018	Noor-ul-ain Hasan	1.60					\$ 536.00	Conducted research on Motion to Strike.
6/20/2018	Suzanne D. Smith	1.30					\$ 429.00	Assist with preparation of reply brief and appendix
6/20/2018	Kristen C. Rodriguez	3.70	2.90				\$ 2,645.50	Work on reply brief, including correspondence regarding edits from A. Gilbert (1.8), review of research on potential motion to strike with N. Hasan (0.3); attention to order on protective order motion (0.8); Draft cover letter to court (0.4); various correspondence regarding filing logistics and edits (0.4).
6/20/2018	Jae K. Park	5.70	1.50	4.20			\$ 3,363.00	Research False Claims Act original source rule and definition of "direct and independent" knowledge requirement (2.3); prepare memorandum regarding same (1.9); prepare affidavit of counsel authenticating documents (1.0); email correspondence to Relator's counsel regarding overlength reply brief (0.5).
6/20/2018	Alan S. Gilbert	0.80	0.80				\$ 860.00	Review and comment on draft reply in support of motion for summary judgment.
6/21/2018	Kristen C. Rodriguez	2.30	1.50				\$ 1,644.50	Edit letter to court (0.3); attend team meeting (0.5); work on reply brief in support of summary judgment, including correspondence regarding same with team (1.5)
6/21/2018	Suzanne D. Smith	8.20					\$ 2,706.00	Assist with Reply brief and appendix (0.5); Review Mt to Amend Protective Order and pull relevant cases for hearing (7.7).
6/21/2018	Noor-ul-ain Hasan	2.50					\$ 837.50	Conducted research on two research points based on direction from Associate (pertaining to internal audit and affirmative evidence)
6/21/2018	Noor-ul-ain Hasan	0.50					\$ 167.50	Synthesized research findings and shared with Associate, identifying high level recommendations and guidance.
6/21/2018	Noor-ul-ain Hasan	0.30					\$ 100.50	Reviewed feedback on Motion to File Under Seal/Motion to File Overlength Brief.
6/21/2018	Noor-ul-ain Hasan	0.70					\$ 234.50	Updated Motion to File Under Seal/Motion to File Overlength Brief and shared updated version with Associate for feedback.
6/21/2018	Noor-ul-ain Hasan	0.50					\$ 167.50	Participated on team status call in preparation for Reply brief.
6/21/2018	Noor-ul-ain Hasan	0.40					\$ 134.00	Made updates to Motion for Leave to File Under Seal/Motion to File 15 Page Reply Brief per team status call updates.
6/21/2018	Noor-ul-ain Hasan	0.90					\$ 301.50	Attempted to find suitable case to support point about internal audit in reply brief after initial search.
6/21/2018	Noor-ul-ain Hasan	0.10					\$ 33.50	Reviewed changes to Reply Brief (3rd draft).
6/21/2018	Tony K. Lu	0.70	0.70				\$ 280.00	Participate in teleconference with team re: reply brief (.5); Review materials to substantiate Title X applicability (.2)
6/21/2018	Jae K. Park	6.70	6.70				\$ 3,953.00	Continue working on reply brief in support of motion for summary judgment and related pleadings (6.2); telephone conference with team regarding final strategy (0.5).
6/21/2018	Noor-ul-ain Hasan	0.70					\$ 234.50	Completed sample of case list assignment to obtain feedback from Partner before proceeding.
6/21/2018	Noor-ul-ain Hasan	0.20					\$ 67.00	Conferred with Partner on case list assignment.
6/21/2018	Noor-ul-ain Hasan	2.30					\$ 770.50	Completed first draft of Case List assignment and shared with Partner for feedback before proceeding with additional tasks.
6/21/2018	Noor-ul-ain Hasan	0.10					\$ 33.50	Made minor update to Motion to File Under Seal/Motion to File Overlength Brief based on conferral with Relator's counsel.
6/21/2018	Noor-ul-ain Hasan	1.10					\$ 368.50	Completed proofing and bluebooking on Reply Brief 3rd draft.
6/21/2018	T. Carter. White	3.60					\$ 1,746.00	Revise reply brief to include arguments regarding court's inability to consider belatedly disclosed evidence (2.2); revise reply brief to cut length (0.9); team call regarding strategy and next steps for filing reply brief (0.5).

Date	Name / Invoice Number	Hours	Plds, Mtn, Brief	Research	Investigation	Interviewing	Amount	Description
6/22/2018	Noor-ul-ain Hasan	0.20					\$ 67.00	Conferred with Partner on two Motion filings and informed Associate of next steps.
6/22/2018	Noor-ul-ain Hasan	0.10					\$ 33.50	Conferred with Associate on next steps for two Motion filings.
6/22/2018	Noor-ul-ain Hasan	0.60					\$ 201.00	Completed proofreading and cite-checking on Reply Brief Draft 3.
6/22/2018	Noor-ul-ain Hasan	0.30					\$ 100.50	Made updates to Plaintiff's Statement of Undisputed Facts per instructions from Partner.
6/22/2018	Noor-ul-ain Hasan	0.10					\$ 33.50	Met with Partner to discuss updates to Statement of Undisputed Facts.
6/22/2018	Noor-ul-ain Hasan	0.60					\$ 201.00	Made bluebooking corrections to Add'l Statement of Undisputed Facts.
6/22/2018	Noor-ul-ain Hasan	0.10					\$ 33.50	Reviewed Table of Contents for bluebooking errors and shared findings with Partner.
6/22/2018	Tony K. Lu	2.50	2.50				\$ 1,000.00	Attention to review of pleadings in further support of reply to summary judgment (.4) ; Review and revise Table of Contents for Reply Appendix (.2); Continue to review and revise supplemental responses to statement of fact and attention to bates label documents. (1.9)
6/22/2018	Noor-ul-ain Hasan	0.30					\$ 100.50	Reviewed feedback on Case List draft.
6/22/2018	Noor-ul-ain Hasan	0.20					\$ 67.00	Met with Associate to discuss updates to Case List.
6/22/2018	Noor-ul-ain Hasan	1.80					\$ 603.00	Made updates to case list based on Associate point-of-view.
6/22/2018	Noor-ul-ain Hasan	0.30					\$ 100.50	Activated links in the case list for Associate.
6/22/2018	Noor-ul-ain Hasan	0.10					\$ 33.50	Delegated case numbering task to Legal Secretary in preparation of Hearing.
6/22/2018	Noor-ul-ain Hasan	0.20					\$ 67.00	Identified additional missing cases and worked with Paralegal to retrieve them for the case list.
6/22/2018	Noor-ul-ain Hasan	1.20					\$ 402.00	Re-read all briefs and identified key arguments that would be pertinent for the Hearing.
6/22/2018	Noor-ul-ain Hasan	1.80					\$ 603.00	Developed initial list of questions to prepare for before the hearing.
6/22/2018	Noor-ul-ain Hasan	1.40					\$ 469.00	Refined list of questions for Hearing and shared with Associate.
6/22/2018	Cicely R. Miltich	0.90					\$ 450.00	Coordinate creation and filing of pro hac vice application; confer with N. Hasan regarding preparation for oral argument
6/22/2018	Suzanne D. Smith	4.50					\$ 1,485.00	Assist with preparation of binder for Protective Order hearing; Assist with preparation of Reply and Appendix
6/22/2018	T. Carter. White	3.00	3.00				\$ 1,455.00	Revise reply brief to incorporate edits from J. Park, myself, and N. Hassan (0.7); review and revise responses to plaintiff's additional facts (1.2); comment on various issues while finalizing the reply brief (0.5); assist with finalizing reply papers (0.6).
6/22/2018	Jae K. Park	4.40	4.40				\$ 2,596.00	Further review and finalize reply brief and related pleadings in support of motion for summary judgment (4.1); finalize all pleadings and coordinate filing (0.3).
6/22/2018	Noor-ul-ain Hasan	0.10					\$ 33.50	Conferred with Partner on integration of omitted case into Reply Brief.
6/22/2018	Kristen C. Rodriguez	7.30	7.30				\$ 5,219.50	Work on reply and ancillary filings, including reply in support of statement of undisputed facts.
6/25/2018	Kristen C. Rodriguez	1.50	1.50				\$ 1,072.50	Review motion to strike Simer Declaration and attend team meeting.
6/25/2018	Suzanne D. Smith	4.10					\$ 1,353.00	Assist with exhibit preparation for filing; Update case law searches for Protective Order argument; Update shared drive to include recent filings and correspondence;
6/25/2018	Cicely R. Miltich	0.20					\$ 100.00	Confer with N. Hasan regarding preparation for oral argument on motion to amend protective order
6/25/2018	Noor-ul-ain Hasan	0.10					\$ 33.50	Completed weekly update to task list.
6/25/2018	Noor-ul-ain Hasan	0.70					\$ 234.50	Attended conference call with PPH team and took notes to update task list.
6/25/2018	Noor-ul-ain Hasan	0.70					\$ 234.50	Synthesized case law, highlighted relevant provisions, and created parentheticals to support proposition regarding Agency/Principal issue to share with Associate.
6/25/2018	Jae K. Park	1.80	1.00				\$ 1,062.00	Review Thayer's motion to strike (1.0); prepare for and attend weekly team telephone conference regarding status and strategy (0.8).
6/25/2018	Noor-ul-ain Hasan	0.50					\$ 167.50	Conducted research on connection between CVS Caremark and False Claims Act case within the context of agency/principal issue.
6/25/2018	Noor-ul-ain Hasan	0.10					\$ 33.50	Located Court's order pertaining to improper procedural use of Motion to Strike for other Associate.

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6/25/2018	Noor-ul-ain Hasan	1.80					\$ 603.00	Conducted research on 8th Circuit/Iowa law regarding Restatement (Second) of Agency application.
6/25/2018	Noor-ul-ain Hasan	0.10					\$ 33.50	Made post-meeting updates to Task List and shared with PPH team.
6/25/2018	Noor-ul-ain Hasan	0.10					\$ 33.50	Conferred with Associate on updates to Task List.
6/25/2018	T. Carter. White	2.80	2.10				\$ 1,358.00	Review and analyze motion to strike B. Simer declaration and supporting materials (0.6); team call regarding strategy for resisting motion to strike (0.7); draft outline of motion to strike (1.5).
6/26/2018	Noor-ul-ain Hasan	0.70					\$ 234.50	Conducted research on agency/principal issue to find a case that can be connected to FCA.
6/26/2018	Noor-ul-ain Hasan	0.50					\$ 167.50	Synthesized 8th Circuit case that could be connected to our case (re: agency/principal issue) and shared findings with Associate.
6/26/2018	T. Carter. White	6.80	5.90	0.90			\$ 3,298.00	Draft resistance to Relator's motion to strike, for extension of discovery, and of her time to file a reply brief (3.3); revise same (1.5); supplemental research regarding good cause for modification of scheduling order, standard for Rule 56(d) motion, and proper foundation for lay testimony (0.9); distinguish cases cited by Relator (1.1).
6/26/2018	Kristen C. Rodriguez	1.00	1.00				\$ 715.00	Review and edit response to motion to strike.
6/26/2018	Suzanne D. Smith	2.20					\$ 726.00	Prepare binder (hard copy) of cases for Protective Order oral argument; Update shared drive to include electronic copy of same
6/27/2018	Cicely R. Miltich	1.30					\$ 650.00	Prepare for oral argument on motion to amend protective order
6/27/2018	Kristen C. Rodriguez	2.00	2.00				\$ 1,430.00	Revise response to motion to strike.
6/27/2018	T. Carter. White	3.40	3.40				\$ 1,649.00	Draft introduction to resistance to motion to strike Simer Decl. (0.8); research ability to introduce lay opinion testimony regarding hypothetical situations (2.6).
6/27/2018	Noor-ul-ain Hasan	0.30					\$ 100.50	Reviewed latest draft of Motion to Strike.
6/27/2018	Jae K. Park	4.70	4.10				\$ 2,773.00	Review draft resistance to Thayer's motion to strike or the conduct the deposition of Becky Simer and file late reply (0.7); conduct legal research regarding Federal Rules of Evidence 701 and proper lay opinion testimony (1.2); draft section of resistance regarding admissibility of Beck Simer's declaration (2.2); communicate with client (0.6).
6/27/2018	Alan S. Gilbert	0.50					\$ 537.50	Conference K. Rodriguez.
6/28/2018	Noor-ul-ain Hasan	0.20					\$ 67.00	Incorporated track changes from Resistance to Plaintiff's Motion to Strike into live document.
6/28/2018	Noor-ul-ain Hasan	0.80					\$ 268.00	Completed initial bluebooking and proofing for Resistance to Plaintiff's Motion to Strike.
6/28/2018	Noor-ul-ain Hasan	0.20					\$ 67.00	Checked in with Associate on questions about changes being made to Resistance to Plaintiff's Motion to Strike and made subsequent updates to Resistance.
6/28/2018	Noor-ul-ain Hasan	0.30					\$ 100.50	Reviewed Motion to Amend Protective Order ahead of Hearing.
6/28/2018	Noor-ul-ain Hasan	1.10					\$ 368.50	Attended hearing on Motion to Amend Protective Order.
6/28/2018	Noor-ul-ain Hasan	0.10					\$ 33.50	Conferred with Associate on updates to bluebooking comments for Resistance to Plaintiff's Motion to Strike.
6/28/2018	T. Carter. White	1.50	1.50				\$ 727.50	Revise Resistance to Thayer's motion to strike based on supplemental research and magistrate's comments.
6/28/2018	Alan S. Gilbert	1.30	0.30				\$ 1,397.50	Telephonic hearing before Judge Bremer (1.0); review plaintiff's motion to strike Simer declaration (0.3).
6/28/2018	Jae K. Park	1.00	1.00				\$ 590.00	Revise and supplement status report to client.
6/28/2018	Kristen C. Rodriguez	3.60	2.10				\$ 2,574.00	Prepare for and attend motion to amend protective order hearing (1.0); edit response to motion to strike (2.1); attention to client memo (0.5)
6/28/2018	Cicely R. Miltich	3.10					\$ 1,550.00	Prepare for and present oral argument on United States' motion to amend the protective order
6/28/2018	Suzanne D. Smith	1.10					\$ 363.00	Assist with pulling documents for attorney review for filing.
6/29/2018	Suzanne D. Smith	1.90					\$ 627.00	Update shared drive to include all discovery and pleadings from past filings.
6/29/2018	Kristen C. Rodriguez	0.50					\$ 357.50	Correspondence with in house counsel
6/29/2018	Kristen C. Rodriguez	2.30	2.30				\$ 1,644.50	Attention to motion to strike public disclosure defense (0.8); review of response to motion to strike Simer Declaration (0.9); calls with local counsel regarding same (0.6).

Date	Name / Invoice Number	Hours	Plds, Mtn, Brief	Research	Investigation	Interviewing	Amount	Description
6/29/2018	Alan S. Gilbert	0.60	0.30				\$ 645.00	Review and edit status memorandum for client (0.3); review plaintiff's new motion to strike and emails regarding same (0.3).
6/29/2018	Noor-ul-ain Hasan	0.50					\$ 167.50	Read through PPH Memo and double checked statutory authority and case cite-checking as well as proofing updates.
6/29/2018	T. Carter. White	2.20	2.20				\$ 1,067.00	Revise resistance to motion to strike and begin organizing exhibits thereto (1.5); review and analyze motion to strike public disclosure defense (0.7).
6/29/2018	Noor-ul-ain Hasan	0.40					\$ 134.00	Read Plaintiff's new motions to strike PPH defenses.
6/29/2018	Noor-ul-ain Hasan	0.10					\$ 33.50	Looked at local rules to determine how we should proceed to request extension for motion.
6/29/2018	Noor-ul-ain Hasan	0.10					\$ 33.50	Summarized local rule issue for Associate to plan for resistance to Plaintiff's Motion to Strike filed on 6-29.
6/29/2018	Jae K. Park	3.40	1.60				\$ 2,006.00	Further revise and supplement status report to client (1.8); review motion to strike public disclosure defense (1.6).
6/30/2018	Kristen C. Rodriguez	6.60	6.60				\$ 4,719.00	Draft and revise resistance to plaintiff's motion to strike Simer declaration.
6/30/2018	Suzanne D. Smith	2.40					\$ 792.00	Download recent filings (0.3); Upload shared drive (0.3). Begin pulling case law for SJ filings (1.8)
7/1/2018	Kristen C. Rodriguez	2.30	2.30				\$ 1,644.50	Revise response to motion to strike.
7/1/2018	T. Carter. White	1.30		1.30			\$ 630.50	Research case law to support Rule 56(d) arguments in Resistance to motion to strike.
7/1/2018	Suzanne D. Smith	1.80					\$ 594.00	Assist with pulling documents for upcoming filing
7/2/2018	T. Carter. White	5.20	5.20				\$ 2,522.00	Revise resistance brief based on comments from N. Hassan and A. Gilbert (2.2); plug fact citations into resistance based on review of record (0.8); manage finalizing brief, including cite-checking, proof-reading, labeling of exhibits, and running tables (0.6); proofread and finalize motion to seal (0.5); conference with C. Miltich regarding motion for extension (0.3); lead strategy call with team regarding filing motion and drafting resistance to new motion to strike (0.3); manage filing and service of resistance brief and exhibits (0.5).
7/2/2018	Noor-ul-ain Hasan	1.10					\$ 368.50	Conducted research on supplementing interrogatories in the Eighth Circuit and shared findings with Associate.
7/2/2018	Tony K. Lu	0.30					\$ 120.00	Participate in weekly teleconference with team and review motion to strike (.3)
7/2/2018	Suzanne D. Smith	4.20					\$ 1,386.00	Assist attorneys with pulling documents in support of upcoming filing (3.9); Participate in weekly team call (0.3).
7/2/2018	Noor-ul-ain Hasan	0.90					\$ 301.50	Made updates to Resistance to Plaintiff's Motion to Strike and shared bluebooking/proofing changes with Associate.
7/2/2018	Noor-ul-ain Hasan	0.30					\$ 100.50	Read through materials for Planned Parenthood upcoming Motions and reviewed remaining Action Items.
7/2/2018	Noor-ul-ain Hasan	0.20					\$ 67.00	Reviewed Local Rules and responded to Associate inquiry regarding the use of exhibits on motions.
7/2/2018	Noor-ul-ain Hasan	0.10					\$ 33.50	Updated Task List after PPH Team Meeting and shared with group.
7/2/2018	Noor-ul-ain Hasan	0.20					\$ 67.00	Attended status call with PPH team and took notes for Task List.
7/2/2018	Noor-ul-ain Hasan	0.10					\$ 33.50	Updated Task List ahead of PPH Team Meeting.
7/2/2018	Cicely R. Miltich	0.50					\$ 250.00	Revise, finalize, and file motion for extension of time to oppose Plaintiff's motion to strike
7/2/2018	Kristen C. Rodriguez	2.70	2.70				\$ 1,930.50	Review and edit resistance to relator's motion to strike/56d motion re: Becky Simer.
7/2/2018	Jae K. Park	0.70	0.70				\$ 413.00	Finalize motion for extension in time to draft resistance to Thayer's motion to strike public disclosure defense (0.4); multiple communications with team regarding same (0.3).
7/2/2018	Alan S. Gilbert	1.50	1.50				\$ 1,612.50	Review and edit response to motion to strike Simer declaration.
7/3/2018	Suzanne D. Smith	2.90					\$ 957.00	Pull Plaintiff's cases cited in SJ filings.
7/5/2018	Suzanne D. Smith	3.00					\$ 990.00	Pull additional cases cited in Plaintiff's Response to SJ (2.0). Add statutes (0.4), convert for shared drive for further review by attorneys (0.5).

Date	Name / Invoice Number	Hours	Plds, Mtn, Brief	Research	Investigation	Interviewing	Amount	Description
7/6/2018	Suzanne D. Smith	4.70					\$ 1,551.00	Update shared drive to include court filed pleadings (2.2); Pull correspondence from FileSite to add to master file for reference (1.4); Update discovery folder and production document folders (1.1)
7/6/2018	T. Carter. White	2.70	1.00		1.70		\$ 1,309.50	Outline resistance to motion to strike public disclosure bar defense (1.0); research standards for updating interrogatory responses (1.7).
7/6/2018	Noor-ul-ain Hasan	2.60					\$ 871.00	Research on obligation to respond to interrogatory that is broad; obligation to respond to more interrogatories than allowed by the rules.
7/6/2018	Noor-ul-ain Hasan	0.40					\$ 134.00	Compiled research findings for Associate, annotated relevant case law in an email.
7/6/2018	Tony K. Lu	0.40	0.40				\$ 160.00	Attention to initial disclosure and review of case law related to motion to strike (.4)
7/7/2018	Kristen C. Rodriguez	0.30	0.30				\$ 214.50	Attention to court orders regarding extension.
7/9/2018	Cicely R. Miltich	0.20					\$ 100.00	Correspondence with C. White regarding research for resistance to motion to strike public disclosure bar argument
7/9/2018	Jae K. Park	1.30	1.30				\$ 767.00	Internal email correspondence with Messrs. Tony Lu and Carter White regarding strategy to oppose Thayer's motion to strike public disclosure defense and documents.
7/9/2018	Noor-ul-ain Hasan	0.10					\$ 33.50	Updated PPH Task List.
7/9/2018	Noor-ul-ain Hasan	2.10					\$ 703.50	Conducted research on plaintiff's failure to move to compel responses to interrogatories and summarized findings in a memo. Reviewed Local Rules to determine appropriate local strategy.
7/9/2018	Noor-ul-ain Hasan	0.10					\$ 33.50	Made updates to task list after conferring with Associate post-call.
7/9/2018	Noor-ul-ain Hasan	0.30					\$ 100.50	Annotated case law with findings and double-checked bluebooking for motion to compel research point.
7/9/2018	T. Carter. White	4.30	4.30				\$ 2,085.50	Coordinate research for resistance to motion to strike public disclosure bar defense with N. Hassan, J. Park, etc. (0.5); begin drafting same based on review of research, factual documents, and prior briefing (3.8).
7/9/2018	Suzanne D. Smith	3.20					\$ 1,056.00	Pull cases cited in Defendant's SJ briefs (2.8). Convert for attorney review (0.4)
7/10/2018	Suzanne D. Smith	3.90					\$ 1,287.00	Search database for Exhibit 22 (2.5); Convert production documents for attorney review (0.5); Update shared drive with converted cases from SJ brief (0.9).
7/10/2018	Jae K. Park	6.80		2.70	4.10		\$ 4,012.00	Legal research regarding case law showing failure to disclose evidence does not mandate exclusion in opposition to Thayer's motion to strike public disclosure defense and documents (2.7); prepare for and hold telephone conference with L. Singer regarding analysis of abortion claim and documents (1.5); search for Exhibit 22 (2.6).
7/10/2018	T. Carter. White	2.00	2.00				\$ 970.00	Review and analyze Plaintiff's reply iso of her motion to strike Simer Decl. (0.6); review and analyze case law cited therein pertaining to ability to make motion to strike (1.0); strategize regarding response in resistance (0.4).
7/10/2018	Kristen C. Rodriguez	0.70	0.40		0.30		\$ 500.50	Attention to correspondence regarding Simer deposition between Simer's attorney and relator's counsel (.3); review plaintiff's reply on Simer motion (.4).
7/10/2018	Noor-ul-ain Hasan	0.40					\$ 134.00	Synthesized email explaining memo on research points (interrogatories and prejudice) for Associate and shared via email.
7/10/2018	Noor-ul-ain Hasan	0.90					\$ 301.50	Conducted research on Prejudice for PPH research point and summarized findings for memo.
7/11/2018	Noor-ul-ain Hasan	0.10					\$ 33.50	Updated PPH task list per conferral with Partner.
7/11/2018	T. Carter. White	3.40	3.40				\$ 1,649.00	Continue drafting resistance to motion to strike public disclosure bar defense, including arguments concerning no motion to compel, prejudice, and response to motion to strike reply.
7/11/2018	Jae K. Park	4.30		4.30			\$ 2,537.00	Continue legal research regarding case law showing failure to disclose evidence does not mandate exclusion in opposition to Thayer's motion to strike public disclosure defense and documents (3.); prepare email memorandum summarizing law to C. White (1.3)

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7/11/2018	Suzanne D. Smith	2.20					\$ 726.00	Revise Exhibit 22, including additional production numbers (0.7); Pull additional case law cited in Plaintiff's SJ briefs (1.5).
7/11/2018	Alan S. Gilbert	0.30	0.30				\$ 322.50	Review emails between plaintiffs' and Simer's counsel (0.1) and conference with C. White regarding same (0.2).
7/12/2018	Suzanne D. Smith	3.80					\$ 1,254.00	Prepare shared drive to include all cases and statutes cited in both Plaintiff and Defendants SJ motion papers;
7/12/2018	T. Carter. White	1.60	1.60				\$ 776.00	Continue drafting resistance to motion to strike public disclosure bar defense including preliminary statement, that there was no disclosure failure, and harmlessness (1.0); supplemental research regarding no need to disclose documents otherwise produced (0.6).
7/12/2018	Noor-ul-ain Hasan	0.10					\$ 33.50	Per direction from partner, reached out to project team to collect outstanding to do list.
7/12/2018	Noor-ul-ain Hasan	0.10					\$ 33.50	Aligned on timing for research assignment re: plaintiff's motion to strike.
7/12/2018	Noor-ul-ain Hasan	0.10					\$ 33.50	Conferred with Associates and paralegal on task list update - relating to specific direction from Partner.
7/12/2018	Timothy M. Fowler	0.40					\$ 90.00	Research and obtain cases and statutes for S. Smith.
7/12/2018	Noor-ul-ain Hasan	0.10					\$ 33.50	Updated task list.
7/12/2018	Noor-ul-ain Hasan	0.50					\$ 167.50	Read through new research assignment from associate and outlined plan for keyword searches and case identification.
7/12/2018	Noor-ul-ain Hasan	2.10					\$ 703.50	Conducted research on 37(c)(1)(C) and 37(b)(2) sanctions for memo and synthesized initial cases.
7/12/2018	Cicely R. Miltich	3.30					\$ 1,650.00	Review Plaintiff's motion to strike; research case law regarding need for disclosure of publicly available documents
7/13/2018	Cicely R. Miltich	1.40					\$ 700.00	Draft portion of resistance to motion to strike related to need to disclose publicly available documents submitted in connection with summary judgment
7/13/2018	Noor-ul-ain Hasan	0.80					\$ 268.00	Conducted research on PPH discovery sanctions research point re: default judgments.
7/13/2018	Noor-ul-ain Hasan	2.30					\$ 770.50	Conducted research on severe and drastic sanctions for non-disclosure for brief.
7/13/2018	Noor-ul-ain Hasan	0.40					\$ 134.00	Synthesized memo describing case law for research point on discovery sanctions and checked bluebooking.
7/13/2018	Noor-ul-ain Hasan	0.40					\$ 134.00	Constructed parentheticals on research point.
7/13/2018	Noor-ul-ain Hasan	0.10					\$ 33.50	Made updates to task list based on new information from Partner.
7/13/2018	Noor-ul-ain Hasan	0.10					\$ 33.50	Conferred with associate on research point to determine if it was on the right track.
7/13/2018	T. Carter. White	2.00	2.00				\$ 970.00	Continue drafting resistance to motion to strike, including arguments that documents were public and striking pleading is a drastic remedy (1.8); revise same and forward to K. Rodriguez (0.2).
7/16/2018	Tony K. Lu	2.30			2.30		\$ 920.00	Participate in teleconference with team and review discovery production and file to determine extent of produced documents (2.3)
7/16/2018	Noor-ul-ain Hasan	0.10					\$ 33.50	Provided Partner with Plaintiff's filings from 6/29 and 7/2.
7/16/2018	Noor-ul-ain Hasan	0.20					\$ 67.00	Updated task list after PPH meeting and shared updates with team.
7/16/2018	Noor-ul-ain Hasan	0.10					\$ 33.50	Updated PPH task list ahead of team meeting.
7/16/2018	Noor-ul-ain Hasan	1.00					\$ 335.00	Participated and took notes on PPH team status call.
7/16/2018	T. Carter. White	2.00		1.00			\$ 970.00	Team call regarding case status, strategy for resistance to motion to strike, and next steps (1.0); research various factual topics such as discovery schedule and Iowa open records response to support revision of resistance to motion to strike (1.0).
7/16/2018	Jae K. Park	2.70			0.70		\$ 1,593.00	Prepare for and attend weekly team telephone conference (1.0); communicate with client (1.0); telephone conference with expert L. Singer regarding strategy for reviewing abortion docs (0.7).
7/16/2018	Suzanne D. Smith	1.60					\$ 528.00	Organize case law for viewing by attorney (0.7). Create sub folders for organization of statutes and cases (0.9)
7/16/2018	Kristen C. Rodriguez	3.60	3.60				\$ 2,574.00	Draft and revise opposition to motion to strike public disclosure bar (3.2), including correspondence with team regarding record and legal research needed (0.4).

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7/17/2018	Kristen C. Rodriguez	7.30	7.30				\$ 5,219.50	Draft and revise response motion to strike public disclosure bar, including review of record and legal research in support of same.
7/17/2018	Noor-ul-ain Hasan	0.10					\$ 33.50	Conferred with Associates and Partner on support for Resistance to Motion to Strike.
7/17/2018	Noor-ul-ain Hasan	0.90					\$ 301.50	Reviewed Resistance brief for bluebooking and grammar and shared findings with Partner.
7/17/2018	Noor-ul-ain Hasan	0.40					\$ 134.00	Completed additional edits to Resistance brief based on Partner feedback.
7/17/2018	Noor-ul-ain Hasan	0.20					\$ 67.00	Made updates to Resistance brief re: page numbers and docket citations.
7/17/2018	Noor-ul-ain Hasan	0.10					\$ 33.50	Reached out to Partner and Associate with questions on internal references in Brief.
7/17/2018	Noor-ul-ain Hasan	0.20					\$ 67.00	After conferring with Partner on questions about citation, sent updated version of Resistance and agreed to check in on the other part of the assignment the following day.
7/17/2018	Noor-ul-ain Hasan	0.10					\$ 33.50	Conferred with Associate on updates to exhibits and internal references.
7/17/2018	T. Carter. White	0.50	0.50				\$ 242.50	Draft insert to resistance brief regarding timeliness of discovery (0.3); research whether Relator's legal team authored the ADF Report (0.2).
7/17/2018	Tony K. Lu	0.60	0.60				\$ 240.00	Provide miscellaneous support to K. Rodriguez and response to motion to strike (.6)
7/18/2018	T. Carter. White	5.30	5.30				\$ 2,570.50	Research whether judicial notice of documents prevents exclusion based on non- or late-disclosure of them (1.1); draft insert to brief regarding same (1.4); work with K. Rodriguez on excerpting, labeling, and redacting exhibits to brief (0.5); add in fact cites to brief (0.7); supplemental research regarding citations in ADF report to news articles and its availability on the ADF website (0.8); analyze necessity of sealing brief (0.4); assist with finalizing brief for filing (0.4).
7/18/2018	Tony K. Lu	0.30			0.30		\$ 120.00	Provide miscellaneous assistant to K. Rodriguez re: interrogatories by Plaintiff (0.3)
7/18/2018	Noor-ul-ain Hasan	0.20					\$ 67.00	Coordinated with Associate on Resistance edits.
7/18/2018	Noor-ul-ain Hasan	0.40					\$ 134.00	Updated brief based on exhibits and docket citations, adding pincites.
7/18/2018	Noor-ul-ain Hasan	0.20					\$ 67.00	Looked into cases cited by Relator and refined research point for Partner.
7/18/2018	Noor-ul-ain Hasan	0.90					\$ 301.50	Reviewed Resistance for final proofing.
7/18/2018	Noor-ul-ain Hasan	0.40					\$ 134.00	Conferred with Partner on remaining updates to Brief.
7/18/2018	Noor-ul-ain Hasan	0.10					\$ 33.50	Spoke with Associate about remaining updates to Exhibits and numbering.
7/18/2018	Noor-ul-ain Hasan	0.20					\$ 67.00	Conferred with Partner on changes to Resistance in DPS version of brief and our version for proofing.
7/18/2018	Noor-ul-ain Hasan	0.30					\$ 100.50	Had multiple phone conversations with Partner on updates to Brief, research point, and syntax updates to Introduction of Brief.
7/18/2018	Noor-ul-ain Hasan	0.60					\$ 201.00	Reviewed exhibits and entered in as correct citations into Resistance.
7/18/2018	Noor-ul-ain Hasan	0.40					\$ 134.00	Shared updates to Resistance with Partner and Associate ahead of additional substantive updates.
7/18/2018	Noor-ul-ain Hasan	1.60					\$ 536.00	Reviewed bluebooking, grammar and final exhibit checks ahead of sharing brief with Partner.
7/18/2018	Alan S. Gilbert	2.80	2.80				\$ 3,010.00	Review and edit draft response so motion to strike public disclosure defense and conferences with K. Rodriguez regarding same.
7/18/2018	Kristen C. Rodriguez	11.50	11.50				\$ 8,222.50	Draft and revise response motion to strike public disclosure bar, including review of record and legal research in support of same regarding judicial notice (8.3); Review exhibits in support of response to conform to record (2.8); Finalize and file brief on ECF docket (0.4).
7/19/2018	T. Carter. White	0.60	0.60				\$ 291.00	Assist with Resistance filing by creating replacement options for troublesome exhibit.
7/19/2018	Jae K. Park	0.30	0.20				\$ 177.00	Review full resistance to Thayer's motion to strike public disclosure bar defense (0.2); communicate with client (0.1)
7/23/2018	Noor-ul-ain Hasan	0.10					\$ 33.50	Updated PPH Task List ahead of team meeting.
7/23/2018	Noor-ul-ain Hasan	0.30					\$ 100.50	Attended and took notes during PPH Team Call.
7/23/2018	Noor-ul-ain Hasan	0.10					\$ 33.50	Updated task list after team meeting.
7/23/2018	Tony K. Lu	0.60	0.20				\$ 240.00	Participate in teleconference with team related to status of case (.4); Review Order on motion to strike (.2)

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7/23/2018	Cicely R. Miltich	1.20					\$ 600.00	Review and draft summary of Magistrate Judge's orders on United States' motion to amend protective order
7/23/2018	T. Carter. White	0.50					\$ 242.50	Team call regarding current case status and strategy.
7/23/2018	Kristen C. Rodriguez	1.00	0.70				\$ 715.00	Attend team call (0.3); review and analyze rulings on motion to strike and protective order motion (0.7).
7/23/2018	Jae K. Park	0.80	0.50				\$ 472.00	Prepare for and attend weekly telephone conference regarding case status and further strategy (0.3); review court's orders on Relator's motions to strike (0.5)
7/23/2018	Alan S. Gilbert	0.50	0.50				\$ 537.50	Review of magistrate orders and e-mails regarding same.
7/24/2018	Alan S. Gilbert	0.30	0.30				\$ 322.50	E-mails regarding magistrate's orders.
7/24/2018	T. Carter. White	0.40	0.40				\$ 194.00	Review and analyze orders regarding amended protective order and motions to strike.
7/24/2018	Noor-ul-ain Hasan	0.40					\$ 134.00	Read Magistrate judge's order and caught up on team point of view on next steps.
7/24/2018	Kristen C. Rodriguez	2.00	0.50				\$ 1,430.00	Analysis of court rulings to determine next steps (0.5); review and edit client alert (1.5).
7/24/2018	Cicely R. Miltich	1.30					\$ 650.00	Draft email to PPH regarding Magistrate Judge's orders on United States' motion to amend; confer with K. Rodriguez regarding Magistrate Judge's orders
7/25/2018	Cicely R. Miltich	1.70					\$ 850.00	Confer with A. Gilbert and K. Rodriguez regarding objections to Magistrate Judge's orders on United States' motion to amend protective order; draft correspondence to DOJ regarding motion to stay effectiveness of Magistrate Judge's order
7/25/2018	Alan S. Gilbert	1.30					\$ 1,397.50	Review order modifying protective order; conference with K. Rodriguez and C. Miltich regarding appeal of magistrate order on Department of Justice modifications to protective order.
7/25/2018	T. Carter. White	1.30			1.30		\$ 630.50	Identify plaintiff's theories for abortion claim based on review and analysis of interrogatory responses (1.0); prepare to follow up on FOIA request by reviewing timing requirements in FOIA law (0.3).
7/25/2018	Noor-ul-ain Hasan	0.60					\$ 201.00	Produced memo and bluebook-checked research assignment ahead of sharing with Partner.
7/25/2018	Noor-ul-ain Hasan	0.80					\$ 268.00	Conducted research on Federal Rule of Civil Procedure 72 as a potential avenue for relief.
7/25/2018	Noor-ul-ain Hasan	0.70					\$ 234.50	Finished research on appealing magistrate judge's order and annotated relevant case law and statutory authority.
7/25/2018	Noor-ul-ain Hasan	0.10					\$ 33.50	Spoke on the phone with Partner for two research questions pertaining to appealing the magistrate judge's order.
7/25/2018	Kristen C. Rodriguez	2.80			0.40		\$ 2,002.00	Conference with team to determine strategy on appeal (0.5); review and edit correspondence with government regarding stay of protective order (0.8); correspondence regarding health care contact (0.8); analysis of research regarding standard of review on appeal to district court judge (0.3); correspondence with J. Park regarding abortion records (0.4).
7/26/2018	Kristen C. Rodriguez	0.40					\$ 286.00	Analysis of research regarding appeal to district court judge of protective order ruling, and correspondence regarding same.
7/26/2018	Noor-ul-ain Hasan	1.80					\$ 603.00	Updated research assignment per further direction from Partner pertaining to standards of review.
7/26/2018	Noor-ul-ain Hasan	2.90					\$ 971.50	Conducted research on raising new arguments on appeal issue re: magistrate judge's order (1.0); produced memo summarizing findings and circuit split (1.5); provided recommendation on course of action (0.4).
7/26/2018	Jae K. Park	1.40					\$ 826.00	Research regarding "healthcare oversight agency" and Department of Justice's obligations as same.
7/26/2018	Cicely R. Miltich	1.10					\$ 550.00	Draft outline of objections to Magistrate Judge's orders on United States' motion to amend protective order
7/27/2018	Cicely R. Miltich	0.30					\$ 150.00	Draft outline of objections to Magistrate Judge's orders on United States' motion to amend protective order

Date	Name / Invoice Number	Hours	Plds, Mtn, Brief	Research	Investigation	Interviewing	Amount	Description
7/27/2018	Jae K. Park	2.60	0.60		0.40		\$ 1,534.00	Continue research regarding "healthcare oversight agency" and Department of Justice's obligations as same (1.0); draft email memorandum regarding research findings to team (0.6); draft letter to expert providing abortion records (0.4); review plaintiff's reply and surreply re: motions for summary judgment (0.6).
7/27/2018	T. Carter. White	1.90	0.80		0.50		\$ 921.50	Review and analyze Plaintiff's SJ reply and surreply (0.5); draft critique of same (0.3); call FOIA office for update on request (0.5); compile sealed SJ materials for transmission to DOJ (0.6).
7/27/2018	Alan S. Gilbert	0.30					\$ 322.50	Conferences with K. Rodriguez regarding stay of magistrate's order.
7/27/2018	Kristen C. Rodriguez	0.50					\$ 357.50	Correspondence with government regarding stay of protective order (0.2); Correspondence with government regarding sealed summary judgment filings (0.2); correspondence with client (0.1)
7/27/2018	Suzanne D. Smith	2.80					\$ 924.00	Review court docket (0.4). Update shared drive with all recent filings (2.0). Forward to attorneys for review (0.4).
7/28/2018	Suzanne D. Smith	2.10					\$ 693.00	Update production index to include production dates
7/28/2018	Cicely R. Miltich	1.80					\$ 900.00	Draft outline of objections to Magistrate Judge's order on United States' motion to amend protective order
7/29/2018	Kristen C. Rodriguez	0.50					\$ 357.50	Review draft of appeal motion regarding protective order (0.3); draft of motion to stay pending appeal (0.2).
7/30/2018	T. Carter. White	2.80	2.80				\$ 1,358.00	Review local rules and federal rules for ability to file a sur-reply (0.4); draft summary of response to argument in reply for potential surreply (0.5); draft motion for leave to file a surreply (1.3); conference with K. Rodriguez regarding strategy for surreply (0.2); review and analyze 1980 AG opinion (0.6).
7/30/2018	Alan S. Gilbert	1.10	0.50				\$ 1,182.50	E-mails regarding Department of Justice not forwarding materials pending appeal of magistrate order (.2); review Thayer reply and surreply regarding Simer declaration (.5); conference with K. Rodriguez regarding sealing issue (.4)
7/30/2018	Suzanne D. Smith	3.10					\$ 1,023.00	Update production spreadsheet to include production dates (2.2). Update shared drive to include recent pleading, forward to attorneys for review (0.9).
7/30/2018	Kristen C. Rodriguez	2.10	1.30				\$ 1,501.50	Call with client (0.4); review and analysis of plaintiff's reply and surreply, and strategy for responding to same (0.6); analysis regarding confidential redactions missing in plaintiff's surreply and strategy for same (0.4); analyze and research newly cited authority in plaintiff's surreply (0.3); correspondence with government (0.1); Work on protective order appeal (0.3).
7/30/2018	Jae K. Park	2.30			2.30		\$ 1,357.00	Review and analyze Thayer's Second Supplemental Response to Special Interrogatories (1.3); brief telephone conference with L. Singer (0.7); draft letter sending abortion related documents (0.3).
7/31/2018	Kristen C. Rodriguez	1.50	0.40				\$ 1,072.50	Review motion for leave to file surreply (0.4); review and edit protective order outline (0.5); correspondence with client (.6)
7/31/2018	T. Carter. White	3.10	3.40				\$ 1,503.50	Review and analyze Plaintiff's surreply and 1989 AG opinion (0.7); draft surreply (1.4); research regarding legal basis for leave to file surreply (0.3); review and revise motion for leave to file surreply (0.7).
8/1/2018	T. Carter. White	0.30	0.30				\$ 145.50	Revise SJ sur-reply brief.
8/1/2018	Kristen C. Rodriguez	0.60	0.30		0.30		\$ 429.00	Correspondence with client (.3); Review draft of motion for leave to file surreply and surreply on new authority (.3).
8/1/2018	Alan S. Gilbert	1.50	1.50				\$ 1,612.50	Review and edit surreply and motion to file surreply.
8/2/2018	Jae K. Park	0.70	0.70				\$ 413.00	Research citations to record and legal authority to support appeal of order amending protective order.

Date	Name / Invoice Number	Hours	Plds, Mtn, Brief	Research	Investigation	Interviewing	Amount	Description
8/2/2018	T. Carter. White	1.60	1.60				\$ 776.00	Revise sur-reply and motion for leave to file it based on comments from A. Gilbert and local counsel, proofread, and cite-check (0.7); forward same to local counsel for input (0.2); research applicability of Iowa family planning network to current dispute (0.3); review OCP spreadsheet for IFPN references (0.4).
8/2/2018	Kristen C. Rodriguez	5.30	1.00				\$ 3,789.50	Call with client (0.5); Conference with S. Smith regarding task list (0.3); Correspondence regarding surreply on new statutes cited (0.5); Draft and revise appeal of protective order ruling (4.0).
8/3/2018	Kristen C. Rodriguez	6.70					\$ 4,790.50	Draft and research for appeal of protective order motion; Edit surreply.
8/3/2018	Jae K. Park	0.90		0.90			\$ 531.00	Research Department of Justice rules and regulations governing disclosures under Freedom of Information Act and notice obligations for commercially confidential information.
8/3/2018	T. Carter. White	0.70	0.70				\$ 339.50	Finalize sur-reply and motion for leave to file it (0.4) and manage filing of same (0.3).
8/4/2018	Suzanne D. Smith	1.50					\$ 495.00	Download pleadings from federal docket (0.6). Update share drive (0.5). Update production index with additional produced documents (0.4).
8/4/2018	Kristen C. Rodriguez	5.00					\$ 3,575.00	Draft and revise appeal of protective order ruling.
8/5/2018	Kristen C. Rodriguez	5.80					\$ 4,147.00	Draft and revise appeal of protective order ruling.
8/5/2018	T. Carter. White	1.50			1.50		\$ 727.50	Research news coverage of Congressional investigations into PPH.
8/6/2018	Ryan Aldrich	0.40					\$ 118.00	Assess, organize, and prepare data for load into review database; Draft and transmit specifications for same.
8/6/2018	T. Carter. White	0.30					\$ 145.50	Review and comment on case status chart;
8/6/2018	Tracy R. Myrick	0.70					\$ 122.50	Work with data set to import into review database according to established specifications; update search indexes as necessary and appropriate; perform data validation steps and document all relevant details.
8/6/2018	Alan S. Gilbert	1.50					\$ 1,612.50	Review and edit objections to magistrate order on Department of Justice amendments to protective order.
8/6/2018	Kristen C. Rodriguez	5.40					\$ 3,861.00	Edit and finalize appeal of magistrate's ruling on protective order.
8/6/2018	Cicely R. Miltich	5.70					\$ 2,850.00	Revise, finalize, and file memorandum objecting to MJ's ruling on United States' motion to amend protective order; research case law regarding separation of powers in context of Court monitoring Congress' use of confidential information
8/6/2018	Suzanne D. Smith	1.00					\$ 330.00	Update weekly team agenda; Update shared drive with recent filings
8/7/2018	Suzanne D. Smith	0.30					\$ 99.00	Team call;
8/7/2018	Kristen C. Rodriguez	0.50					\$ 357.50	Attend team meeting (0.3); correspondence with client (0.2).
8/7/2018	T. Carter. White	1.60					\$ 776.00	Review and analyze brief appealing decision on protective order (0.8); call federal FOIA re status of request (0.5); team call regarding case status and next steps (0.3).
8/7/2018	Ryan Aldrich	0.40					\$ 118.00	Finalize quality control process for new data set prior to releasing to case team; Update review database with tracking information; Draft and circulate status update and details for deliverable.
8/7/2018	Jae K. Park	2.20			1.20		\$ 1,298.00	Review and analyze final appeal of magistrate judge's order on motion to amend protective order (0.7); prepare for and attend team status and strategy telephone conference (0.3); review and analyze new medical files recently provided by client (1.2).
8/8/2018	Kristen C. Rodriguez	0.20			0.20		\$ 143.00	Attention to correspondence regarding AB record.
8/9/2018	Jae K. Park	1.00			1.00		\$ 590.00	Draft letter to Thayer's counsel regarding production of abortion records.
8/13/2018	Jae K. Park	3.30			3.30		\$ 1,947.00	Review and analyze Thayer's Second Supplemental responses to interrogatories and relevant medical files (2.7); telephone conference with L. Singer regarding analysis of Thayer's abortion allegations (0.6).
8/13/2018	Suzanne D. Smith	1.80					\$ 594.00	Prepare additional abortion file for production (1.5); Update team meeting agenda (0.3)
8/13/2018	Kristen C. Rodriguez	0.10			0.10		\$ 71.50	Correspondence with team regarding status.

Date	Name / Invoice Number	Hours	Plds, Mtn, Brief	Research	Investigation	Interviewing	Amount	Description
8/14/2018	Kristen C. Rodriguez	3.50			2.70		\$ 2,502.50	Analysis of abortion patient files and plaintiff's interrogatory response (2.5); attend team call regarding same (0.8); correspondence with team regarding AB spreadsheet and patient records (0.2)
8/14/2018	Suzanne D. Smith	2.20					\$ 726.00	Participate in team meeting (0.8); Update agenda (0.3); Search discovery for mention of abortion spreadsheet (0.5); forward production documents to K. Rodriguez for review (0.2). Finalize redactions for new production (0.4).
8/14/2018	Jae K. Park	0.80					\$ 472.00	Attend weekly telephone conference regarding case status and strategy.
8/14/2018	T. Carter. White	0.90					\$ 436.50	Team call regarding analysis of abortion claims and plan for defense and discovery on same issues.
8/15/2018	T. Carter. White	0.10			0.10		\$ 48.50	Review prior productions regarding abortion patient records.
8/15/2018	T. Carter. White	0.40			0.40		\$ 194.00	Call and email D. Preston at DOJ regarding status of FOIA request.
8/15/2018	Alan S. Gilbert	1.30					\$ 1,397.50	Conferences with K. Rodriguez regarding call with client board and participate in call with client board.
8/15/2018	Suzanne D. Smith	4.60					\$ 1,518.00	Update spreadsheet to include total charges for abortion patients (3.8); Begin assembling abortion files for attorney review (0.8).
8/15/2018	Kristen C. Rodriguez	2.60			1.30		\$ 1,859.00	Prepare for meeting with board of client (0.3); attend meeting with board (1.0); analysis of liability for Phase 2 (1.3).
8/16/2018	Suzanne D. Smith	2.40					\$ 792.00	Assemble abortion patient files, hard copy and electronic copy (1.7); Prepare spreadsheet of patient information/production numbers (0.7)
8/16/2018	Jae K. Park	1.20			1.20		\$ 708.00	Verify accuracy of redactions to patient records before production (0.7); revise and update cover letter providing new production (0.5).
8/16/2018	Kristen C. Rodriguez	0.50			0.50		\$ 357.50	Correspondence with team regarding plaintiff's Ex. 22 and expert analysis.
8/17/2018	Kristen C. Rodriguez	0.80			0.50		\$ 572.00	Attention to correspondence with counsel for PPMNCS (0.3); analysis of same with A. Gilbert (0.3); call with M. Foarde (0.2)
8/17/2018	Alan S. Gilbert	0.50			0.50		\$ 537.50	Conference with K. Rodriguez regarding client privilege issues.
8/17/2018	Suzanne D. Smith	2.10					\$ 693.00	Create electronic abortion files.
8/20/2018	Kristen C. Rodriguez	1.70			1.30		\$ 1,215.50	Call with client (0.5); edit letter to plaintiff's counsel regarding additional files (0.5); conference with A. Gilbert regarding privilege issues strategy (0.3); review and analyze DOJ filing (0.4).
8/20/2018	T. Carter. White	0.20			0.10		\$ 97.00	Review patient files for abortion claims (0.1); review and analyze government's response to objections to magistrate's ruling on protective order (0.1).
8/20/2018	Alan S. Gilbert	1.00					\$ 1,075.00	Review Department of Justice response to protective order appeal and conference with K. Rodriguez and C. Miltich regarding same.
8/20/2018	Jae K. Park	0.70			0.70		\$ 413.00	Further revise and edit letter to Thayer's counsel enclosing new abortion patient records and related issues.
8/20/2018	Ryan Aldrich	0.60					\$ 177.00	Prepare documents for production to opposing counsel, per S. Smith's request.
8/20/2018	Cicely R. Miltich	0.90					\$ 450.00	Review United States' opposition to objections to Magistrate Judge's ruling on motion to amend protective order; confer with K. Rodriguez and A. Gilbert regarding reply memorandum
8/20/2018	Suzanne D. Smith	1.00					\$ 330.00	Prepare production for team review (0.7); Update shared drive to include new production and recent pleadings/correspondence (0.3)
8/21/2018	Suzanne D. Smith	1.90					\$ 627.00	Prepare spreadsheet of 21 abortion patents including all information used in Plaintiff's previous spreadsheet
8/21/2018	Kristen C. Rodriguez	0.80			0.80		\$ 572.00	Revise letter to opposing counsel (0.2); correspondence regarding production logistics (0.6).
8/21/2018	Jae K. Park	2.00			2.00		\$ 1,180.00	Multiple revisions to letter enclosing additional abortion records.
8/22/2018	Jae K. Park	1.30			0.90		\$ 767.00	Further revise letter enclosing production of documents (0.4); continue research into production protocol (0.9).
8/23/2018	Kristen C. Rodriguez	1.00			0.50		\$ 715.00	Work on reply brief in support of appeal of magistrate's ruling (0.5); review prior litigation hold (0.2); draft email with client (0.3).

Date	Name / Invoice Number	Hours	Plds, Mtn, Brief	Research	Investigation	Interviewing	Amount	Description
8/23/2018	Cicely R. Miltich	5.40					\$ 2,700.00	Research case law regarding purpose of protective orders, amendments of protective order underlying reliance interests in protective orders, and need to show alleviation of prejudice before granting amendments; confer with K. Rodriguez regarding reply in support of objections to Magistrate Judge's amended protective order; draft reply memorandum in support of objections
8/23/2018	Jae K. Park	1.30			1.30		\$ 767.00	Email correspondence with Thayer's counsel regarding discovery issues (0.3); email with team regarding same (0.2); communicate with K. Rodriguez regarding Plaintiff's Exhibit 22 (0.3); communicate with expert regarding review status (0.5).
8/24/2018	Cicely R. Miltich	1.90					\$ 950.00	Finish drafting reply memorandum in support of objections to magistrate judge's ruling on motion to amend protective order
8/24/2018	Kristen C. Rodriguez	2.50					\$ 1,787.50	Work on reply in support of appeal of magistrate's ruling regarding protective order.
8/27/2018	Suzanne D. Smith	1.10					\$ 363.00	Prepare updated agenda for team meeting (0.5). Review court docket, update shared drive to include additional key pleadings (0.6).
8/27/2018	Jae K. Park	0.70					\$ 413.00	Review and analyze Department of Justice's Notice of Statement of Interest (0.3); communicate with team regarding further strategy and status (0.4).
8/27/2018	Kristen C. Rodriguez	6.50					\$ 4,647.50	Attention to government's statement of non interest (0.2); draft and revise reply in support of appeal of magistrate's order (6.3).
8/27/2018	Cicely R. Miltich	0.50					\$ 250.00	Review and revise reply memorandum in support of objections to Magistrate Judge's order on motion to amend protective order
8/28/2018	T. Carter. White	0.10			0.10		\$ 48.50	Review and analyze FOIA denial (0.1); update team regarding same (0.1); review and analyze reply on protective order (0.1).
8/28/2018	Jae K. Park	0.80					\$ 472.00	Review and analyze Reply in Support of Appeal of Magistrate Judge's Order Amending Protective Order (0.5); email to client (0.3).
8/28/2018	Kristen C. Rodriguez	0.10					\$ 71.50	Correspondence with client.
8/29/2018	Kristen C. Rodriguez	1.10					\$ 786.50	Call with client.
8/30/2018	Jae K. Park	2.40			2.40		\$ 1,416.00	Continue review and analysis of abortion documents and plaintiff's responses to interrogatories and prepare memorandum regarding same.
9/2/2018	Jae K. Park	3.40			3.40		\$ 2,006.00	Continue review and analysis of medical records of abortion patients relevant to Thayer's interrogatory responses.
9/4/2018	Kristen C. Rodriguez	0.30					\$ 214.50	Review transcript from latest hearing for necessary redactions.
9/5/2018	Kristen C. Rodriguez	2.00			2.00		\$ 1,430.00	Call with expert regarding her analysis of plaintiff's responses to interrogatories on Phase 2 (1.8); follow up call with J. Park regarding next steps for same (0.2).
9/5/2018	Suzanne D. Smith	1.40					\$ 462.00	Update shared drive to include separated abortion patient files, with spreadsheet contents.
9/5/2018	Jae K. Park	2.50			2.50		\$ 1,475.00	Prepare and conduct telephone interview of expert regarding analysis of abortion related files and interrogatory responses.
9/7/2018	Suzanne D. Smith	3.30					\$ 1,089.00	Continue to review and analyze abortion patient spreadsheet and identify date of visit information for further analysis.
9/7/2018	Jae K. Park	0.50			0.50		\$ 295.00	Telephone conference with L. Singer regarding deposition and other discovery issues (0.3); draft report to client (0.2).
9/10/2018	T. Carter. White	0.60			0.60		\$ 291.00	Team call regarding strategy and next steps for abortion phase of discovery and case.
9/10/2018	Kristen C. Rodriguez	1.00			1.00		\$ 715.00	Prep for and attend call with team.
9/10/2018	Suzanne D. Smith	2.80					\$ 924.00	Update team call agenda (0.3); Participate in team call (0.7); update agenda (0.2); Review master abortion spreadsheet (0.8); Pull care information for 21 requested patients (0.8).
9/11/2018	Suzanne D. Smith	2.20					\$ 726.00	Continue to review and analyze abortion patient spreadsheet and identify date of visit information for further analysis.
9/11/2018	Jae K. Park	0.80			0.80		\$ 472.00	Prepare for and hold telephone conference with team regarding L. Singer's analysis.
9/12/2018	Jae K. Park	5.90			5.90		\$ 3,481.00	Work on memorandum summarizing Thayer's allegations regarding abortion patient records and interrogatory responses and responses and defenses to same.

Date	Name / Invoice Number	Hours	Plds, Mtn, Brief	Research	Investigation	Interviewing	Amount	Description
9/13/2018	Suzanne D. Smith	2.50					\$ 825.00	Continue to review and analyze abortion patient spreadsheet and identify date of visit information for further analysis.
9/13/2018	Jae K. Park	2.30			2.30		\$ 1,357.00	Continue working on memorandum analyzing Thayer's allegations and claims regarding abortion files and Exhibit 22.
9/17/2018	Suzanne D. Smith	2.90					\$ 957.00	Continue to review and analyze abortion patient spreadsheet and identify date of visit information for further analysis.
9/17/2018	Jae K. Park	2.20			2.20		\$ 1,298.00	Work on expert report.
9/17/2018	Kristen C. Rodriguez	0.20					\$ 143.00	Attention to audit letter response.
9/18/2018	Jae K. Park	1.00			1.00		\$ 590.00	Continue researching examples of false claims act expert reports.
9/18/2018	T. Carter. White	0.10	0.10				\$ 48.50	Review status of motion for leave to file a sur-reply.
9/19/2018	T. Carter. White	0.20			0.20		\$ 97.00	Review and analyze response to FOIA request.
9/20/2018	Suzanne D. Smith	1.20					\$ 396.00	Update agenda for upcoming team call (0.4); Update shared drive to include recent correspondence (0.8).
9/25/2018	Jae K. Park	0.40			0.40		\$ 236.00	Telephone conference with L. Singer regarding review of supplemental abortion file (0.2); draft letter enclosing same (0.2).
9/25/2018	Suzanne D. Smith	1.70					\$ 561.00	Continue to review and analyze abortion patient spreadsheet and identify date of visit information for further analysis.
9/28/2018	Suzanne D. Smith	2.80					\$ 924.00	Continue to review and analyze abortion patient spreadsheet and identify date of visit information for further analysis.
10/1/2018	Suzanne D. Smith	5.90					\$ 1,947.00	Prepare agenda for weekly team call (0.5); Participate in team call (0.5); Update spreadsheet regarding abortion/appointment follow-up dates (4.9)
10/1/2018	T. Carter. White	0.90					\$ 436.50	Team call regarding case status and strategy (0.5); research sample expert reports submitted by expert Knau and others in Taylor-Vick case (0.4).
10/1/2018	Cicely R. Miltich	0.20					\$ 100.00	Review Judge Jarvey's order denying appeal from Magistrate Judge
10/1/2018	Jae K. Park	1.20			1.00		\$ 708.00	Prepare for and attend weekly status conference with litigation team (0.6); consider and analyze strategy for following up with plaintiff's counsel regarding last abortion file (0.4); review and analyze court's order on appeal and objection to magistrate judge's ruling on motion to amend protective order (0.2).
10/1/2018	Kristen C. Rodriguez	0.50			0.50		\$ 357.50	Prepare for and attend team meeting (0.5); attention to magistrate order (0.1).
10/1/2018	Alan S. Gilbert	0.80			0.50		\$ 860.00	Review article on DOJ dismissals of FCA claims (0.5); review judge's decision on appeal from magistrate (0.3)
10/2/2018	Cicely R. Miltich	0.20					\$ 100.00	Draft summary of district court's ruling on appeal from Magistrate Judge's order granting DOJ's motion to amend protective order
10/2/2018	T. Carter. White	1.20			0.90		\$ 582.00	Review and analyze order denying appeal on protective order (0.3); research and pull sample expert reports from FCA Medicaid/Medicare cases (.9).
10/2/2018	Suzanne D. Smith	3.30					\$ 1,089.00	Update spreadsheet regarding abortion/appointment follow up dates.
10/2/2018	Jae K. Park	0.50			0.50		\$ 295.00	Draft letter to Thayer's counsel regarding status of further request for abortion patient records.
10/2/2018	Jae K. Park	1.30					\$ 767.00	Prepare audit letter.
10/2/2018	Jae K. Park	0.50			0.50		\$ 295.00	Continue researching sample expert reports.
10/2/2018	Kristen C. Rodriguez	0.20					\$ 143.00	Review draft correspondence to client.
10/4/2018	Suzanne D. Smith	2.50					\$ 825.00	Further update spreadsheet regarding abortion/appointment follow up dates.
10/4/2018	Kristen C. Rodriguez	0.50			0.50		\$ 357.50	Review correspondence from plaintiff's counsel regarding AB files (0.3); correspondence with team regarding same (0.2).
10/4/2018	T. Carter. White	0.30			0.30		\$ 145.50	Review and analyze letter from R. Hixson regarding abortion patient sampling (0.2); review records regarding court order on same issue (0.1).
10/4/2018	Jae K. Park	0.70			0.70		\$ 413.00	Review and analyze correspondence from counsel for Thayer regarding abortion sampling files (0.3); communicate with team regarding strategy (0.2); review court order on motion to compel addressing reasonably accessible records (0.2).
10/5/2018	Kristen C. Rodriguez	0.20					\$ 143.00	Correspondence regarding PPMNS integration.
10/6/2018	Kristen C. Rodriguez	0.20					\$ 143.00	Correspondence to client.
10/7/2018	Kristen C. Rodriguez	0.50					\$ 357.50	Analysis and correspondence with client.

Time Entry Records in
United States ex rel. Thayer v. Planned Parenthood of the Heartland

Date	Name / Invoice Number	Hours	Plds, Mtn, Brief	Research	Investigation	Interviewing	Amount	Description
10/8/2018	Alan S. Gilbert	0.80					\$ 860.00	Telephone conference re. billing and coding review (0.3); conference with K. Rodriguez re. strategy on abortion side of case (0.5)
10/8/2018	Tony K. Lu	0.20		0.20			\$ 80.00	Attention to issue pertaining to FCA/piercing corporate veil (.2)
10/8/2018	Kristen C. Rodriguez	1.30					\$ 929.50	Prepare for and attend call with client.
10/9/2018	Jae K. Park	2.00			2.00		\$ 1,180.00	Draft meet and confer letter to Relator's counsel regarding abortion files.
10/11/2018	Jae K. Park	0.30			0.30		\$ 177.00	Communicate with K. Rodriguez regarding abortion sampling file issues.
10/11/2018	T. Carter. White	0.30			0.30		\$ 145.50	Conference with K. Rodriguez regarding research on sampling and review of sampling correspondence.
10/11/2018	Kristen C. Rodriguez	1.60			0.90		\$ 1,144.00	Attention to draft correspondence in response to plaintiff's counsel (0.4); correspondence with client (0.5); work on audit letter and due diligence (0.7).
10/12/2018	Tony K. Lu	0.10					\$ 40.00	Attention to Planned Parenthood audit matter (0.1).
10/12/2018	Suzanne D. Smith	1.00					\$ 330.00	Update shared drive to include correspondence and sealed pleadings.
10/15/2018	Richard M. Zuckerman	0.70					\$ 742.00	Review and edit response to audit letter
10/15/2018	Jae K. Park	0.50					\$ 295.00	Finalize audit response letter.
10/15/2018	T. Carter. White	3.20		2.50	0.70		\$ 1,552.00	Review and analyze correspondence and prior motion to compel briefing and draft summary of positions taking regarding discovery and sampling (0.7); review case law regarding potentially analogous situations (1.0); review case law regarding statistical sampling in FCA cases (1.5).
10/15/2018	Kristen C. Rodriguez	1.20					\$ 858.00	Edit and draft audit letter; attention to litigation hold.
10/15/2018	Suzanne D. Smith	2.90					\$ 957.00	Assist C. White in obtaining sealed pleadings (0.7); Update team agenda for weekly meeting (0.3); Update abortion spreadsheet to include time between visit information (1.9)
10/16/2018	Suzanne D. Smith	1.00					\$ 330.00	Update shared drive to include sealed pleadings and additional correspondence.
10/16/2018	T. Carter. White	0.80		0.80			\$ 388.00	Analyze options for proceeding in this case without statistical sampling based on review of case law; draft summary of same.
10/17/2018	T. Carter. White	0.10					\$ 48.50	Emails regarding strategy call.
10/17/2018	Jae K. Park	1.00			1.00		\$ 590.00	Telephone conference with K. Rodriguez regarding abortion files (0.5); telephone conference with client (0.5).
10/17/2018	Kristen C. Rodriguez	0.80			0.80		\$ 572.00	Conference with client (0.5); call with J. Park re: AB files (0.3).
10/18/2018	Kristen C. Rodriguez	1.30			1.30		\$ 929.50	Prepare for and lead team strategy meeting.
10/18/2018	Jae K. Park	1.00			1.00		\$ 590.00	Prepare for and participate in conference call with team regarding status of matter and further strategy in abortion portion of claim.
10/18/2018	Suzanne D. Smith	3.90					\$ 1,287.00	Finalize abortion spreadsheet.
10/18/2018	T. Carter. White	2.50			2.50		\$ 1,212.50	Review and analyze correspondence, briefing, and court orders on discovery for insight into positions taken regarding sampling (1.5); team call regarding status and strategy for abortion discovery, especially sampling issues (1.0).
10/19/2018	T. Carter. White	0.20			0.20		\$ 97.00	Work on setting up abortion emails for review.
10/20/2018	Suzanne D. Smith	2.50					\$ 825.00	Update abortion spreadsheet to include day totals.
10/22/2018	Suzanne D. Smith	2.30					\$ 759.00	Assist J. Park with preparation of spreadsheet of billing information being sent to client for review.
10/22/2018	Jae K. Park	1.50			1.50		\$ 885.00	Worked on issues regarding abortion sampling files (1.0); draft email to client (0.5).
10/22/2018	T. Carter. White	0.60			0.60		\$ 291.00	Review and analyze emails regarding abortions.
10/23/2018	T. Carter. White	0.60			0.60		\$ 291.00	Review and analyze emails regarding abortions.
10/23/2018	Jae K. Park	0.50			0.50		\$ 295.00	Review revised spreadsheet of abortion patient billing records (0.4); email to client (0.1).
10/23/2018	Suzanne D. Smith	2.00					\$ 660.00	Finalize spreadsheet of billing information to be sent to client for review.
10/24/2018	Jae K. Park	1.50			1.50		\$ 885.00	Review and analyze Planned Parenthood abortion related documents produced in litigation (1.0); telephone conference with L. Singer regarding her analysis of patient files and report writing (0.5).
10/25/2018	Jae K. Park	1.40			1.40		\$ 826.00	Continue researching sample expert reports (1.0); forward sample reports to L. Singer (0.4).
10/25/2018	Suzanne D. Smith	0.90					\$ 297.00	Update shared drive to include expert documents (0.4); Update spreadsheet and forward to team for review (0.5).
10/26/2018	T. Carter. White	0.10			0.10		\$ 48.50	Email r. Hixson re: redacted documents.

Time Entry Records in
United States ex rel. Thayer v. Planned Parenthood of the Heartland

Date	Name / Invoice Number	Hours	Plds, Mtn, Brief	Research	Investigation	Interviewing	Amount	Description
10/26/2018	Kristen C. Rodriguez	1.50			1.50		\$ 1,072.50	Review chronology of sampling agreements and relevant decisions regarding same.
10/29/2018	T. Carter. White	0.80			0.80		\$ 388.00	Review and analyze abortion emails for relevant or concerning facts.
10/29/2018	Suzanne D. Smith	3.40					\$ 1,122.00	Obtain outlook folder from R. Sangiacomo. Review email for attorney correspondence to client and opposing counsel; Update shared drive.
10/29/2018	Kristen C. Rodriguez	1.90			1.90		\$ 1,358.50	Draft and revise letter to plaintiff's counsel regarding abortion sampling.
10/30/2018	Kristen C. Rodriguez	0.40			0.40		\$ 286.00	Follow up correspondence with plaintiff's counsel regarding abortion sampling (0.2); internal correspondence with team regarding meet and confer (0.2).
11/1/2018	Tony K. Lu	0.10			0.10		\$ 40.00	Teleconference with Carter White re: redaction documents (.1)
11/1/2018	T. Carter. White	1.90			1.90		\$ 921.50	Prepare for, have, and digest meet and confer call with opposing counsel regarding sampling and implications for summary judgment (1.6); draft recap of same (0.3).
11/1/2018	Kristen C. Rodriguez	1.20			1.20		\$ 858.00	Prepare for and attend conference with opposing counsel.
11/1/2018	Suzanne D. Smith	1.50					\$ 495.00	Review Rosann'e outlook folders, update shared drive with additional correspondence and production information
11/1/2018	Alan S. Gilbert	0.50			0.50		\$ 537.50	Conference with K. Rodriguez and C. White regarding strategy on abortion claims.
11/5/2018	Kristen C. Rodriguez	0.30			0.30		\$ 214.50	Correspondence with team regarding phase two strategy.
11/5/2018	Suzanne D. Smith	0.20					\$ 66.00	Prepare agenda for weekly team call
11/6/2018	Suzanne D. Smith	1.60					\$ 528.00	Review past files of R. Sangiacomo, gather, add to shared drive for attorney review.
11/7/2018	Suzanne D. Smith	2.80					\$ 924.00	Participate in weekly team call (1.0); update follow-up agenda (0.3); Review emails regarding email collection for abortion files (0.8); prepare request to T Lu (0.7)
11/7/2018	Jae K. Park	0.90			0.90		\$ 531.00	Prepare for and hold telephone conference with team regarding case strategy for abortion related claims and discovery issues.
11/7/2018	Kristen C. Rodriguez	1.00			1.00		\$ 715.00	Prepare for and attend team call regarding phase 2 strategy.
11/7/2018	T. Carter. White	0.80			0.80		\$ 388.00	Team call regarding case status and strategy.
11/8/2018	Kristen C. Rodriguez	0.50					\$ 357.50	Correspondence regarding meetings with PPH officers.
11/8/2018	Tony K. Lu	1.10			1.10		\$ 440.00	Attention to and review records related PPH Abortion-related Billing Documents (1.1)
11/8/2018	T. Carter. White	0.40			0.40		\$ 194.00	Review and analyze memo summarizing expert's thoughts on responding to abortion claims.
11/9/2018	T. Carter. White	1.40	1.10		0.30		\$ 679.00	Email J. Park regarding summary judgment outline (0.5); call R. Hixson re: redacted documents (0.3); draft outline of abortion SJ arguments based on review and analysis of OCP SJ briefs (0.6).
11/12/2018	Suzanne D. Smith	2.90					\$ 957.00	Finalize spreadsheet, sorting information by number of days between abortion and next day of service and forward to attorneys for review
11/12/2018	Jae K. Park	1.60	1.60				\$ 944.00	Prepare for and hold telephone conference with team regarding case status and strategy (1.0); work on outline for summary judgment motion for abortion claim (0.6)
11/12/2018	T. Carter. White	1.60	1.60				\$ 776.00	Revise draft abortion SJ outline based on review and analysis of SJ briefing, interrogatory responses, and prior MTD decision (0.6); team call regarding case status and strategy (1.0).
11/12/2018	Kristen C. Rodriguez	1.00	1.00				\$ 715.00	Prepare for and attend team call.
11/13/2018	Kristen C. Rodriguez	0.20					\$ 143.00	Correspondence regarding PPH officer meeting.
11/13/2018	T. Carter. White	0.20	0.20				\$ 97.00	Revise outline for abortion SJ motion based on comments from J. Park.
11/14/2018	T. Carter. White	0.20	0.20				\$ 97.00	Edit SJ outline based on comments from J. Park and circulate.
11/14/2018	Jae K. Park	2.20	1.10		1.10		\$ 1,298.00	Prepare for and hold telephone conference with L. Singer regarding strategy for defense, sample size, statistical analysis, and motion for summary judgment (1.1); revise and supplement outline for motion for summary judgment (0.7); email correspondence with team regarding strategy for motion for summary judgment (0.4).
11/14/2018	Kristen C. Rodriguez	1.00	1.00				\$ 715.00	Review and revise Phase II Summary Judgment outline (0.7); correspondence regarding same (0.3).

Time Entry Records in
United States ex rel. Thayer v. Planned Parenthood of the Heartland

Date	Name / Invoice Number	Hours	Plds, Mtn, Brief	Research	Investigation	Interviewing	Amount	Description
11/15/2018	Suzanne D. Smith	1.90					\$ 627.00	Update abortion spreadsheet to include sample/produced patient files
11/15/2018	Kristen C. Rodriguez	0.30			0.30		\$ 214.50	Correspondence regarding excel of patients for analysis of phase two.
11/16/2018	T. Carter. White	0.30			0.30		\$ 145.50	Review and analyze abortion patient tracking spreadsheet.
11/19/2018	Alan S. Gilbert	0.50					\$ 537.50	Telephone conference with clients.
11/19/2018	Kristen C. Rodriguez	0.70					\$ 500.50	Attend team call (0.3); correspondence with opposing counsel (0.4).
11/20/2018	Tracy R. Myrick	1.50					\$ 262.50	Work with data set to import into review database according to established specifications; update search indexes as necessary and appropriate; perform data validation steps and document all relevant details.
11/20/2018	Ryan Aldrich	0.80					\$ 236.00	Assess, organize, and prepare data for load into review database; Draft and transmit specifications for same. .4` ` Finalize quality control process for new data set prior to releasing to case team; Update review database with tracking information; Draft and circulate status update and details for deliverable. .4
11/21/2018	Ryan Aldrich	0.20					\$ 59.00	Perform searches to isolate documents for attorney review, per S. Smith's request.
11/21/2018	Jae K. Park	1.20			1.20		\$ 708.00	Telephone conference with K. Rodriguez regarding strategy for meet and confer call with Plaintiff regarding scope of discovery on abortion claim (0.3); attend meet and confer telephone conference with Plaintiff (0.4); email communication with L. Singer regarding outline for expert report (0.5).
11/21/2018	Kristen C. Rodriguez	1.00					\$ 715.00	Prepare for and attend conference with opposing counsel.
11/21/2018	Suzanne D. Smith	0.80					\$ 264.00	Review additional produced Relativity documents regarding abortion issues, code for further review by attorneys
11/26/2018	Kristen C. Rodriguez	0.50			0.50		\$ 357.50	Correspondence and analysis regarding review of phase 2 related emails.
11/28/2018	Suzanne D. Smith	3.20					\$ 1,056.00	Review Relativity produced documents, tag abortion related documents for further review
12/1/2018	Suzanne D. Smith	3.30					\$ 1,089.00	Review abortion related produced documents, tag for attorney further review
12/3/2018	Jae K. Park	0.20			0.20		\$ 118.00	Email correspondence with L. Singer regarding status of expert report.
12/3/2018	T. Carter. White	0.10					\$ 48.50	Review case status chart.
12/3/2018	Ryan Aldrich	0.30					\$ 88.50	Prepare documents for attorney review, per S. Smith's request.
12/3/2018	Suzanne D. Smith	2.80					\$ 924.00	Review additional abortion documents, forward findings to Lit Support to create link for further attorney review.
12/4/2018	Kristen C. Rodriguez	0.50			0.50		\$ 357.50	Correspondence and analysis regarding remaining abortion produced documents.
12/5/2018	T. Carter. White	0.60			0.60		\$ 291.00	Review and analyze abortion related emails for relevance.
12/6/2018	Jae K. Park	0.20			0.20		\$ 118.00	Exchange emails with L. Singer regarding status of analysis and expert report.
12/7/2018	T. Carter. White	0.50			0.50		\$ 242.50	Review and analyze abortion documents for relevance.
12/9/2018	Kristen C. Rodriguez	1.70			1.70		\$ 1,215.50	Draft and revise stipulation regarding Phase II.
12/10/2018	Suzanne D. Smith	3.20					\$ 1,056.00	Review additional abortion documents, tag for attorney further review
12/10/2018	Kristen C. Rodriguez	0.60			0.60		\$ 429.00	Correspondence with team regarding status and stipulation (0.2); Revise stipulation (0.4).
12/11/2018	Kristen C. Rodriguez	0.60			0.60		\$ 429.00	Revise stipulation regarding phase 2 (0.3); correspondence regarding abortion files with S. Smith (0.3).
12/11/2018	Suzanne D. Smith	2.50					\$ 825.00	Review additional abortion documents and tag for further review by attorneys
12/11/2018	T. Carter. White	3.00			3.00		\$ 1,455.00	Review and analyze abortion emails and documents for relevance (0.7); call and email R. Hixson regarding unredacted documents (0.5); review and comment on draft stipulation regarding phase II discovery (1.8).
12/12/2018	Tony K. Lu	0.20			0.20		\$ 80.00	Provide assistance to Carter White re: redacted documents for production (.2)
12/12/2018	Jae K. Park	1.00			1.00		\$ 590.00	Prepare for and attend telephone conference with team regarding stipulation on abortion claims and related issues.
12/12/2018	T. Carter. White	1.00			1.00		\$ 485.00	Review, analyze and respond to email from R. Hixson regarding document redactions (0.1); team strategy call (0.9).

Date	Name / Invoice Number	Hours	Plds, Mtn, Brief	Research	Investigation	Interviewing	Amount	Description
12/13/2018	Jae K. Park	1.50			1.50		\$ 885.00	Prepare memorandum on abortion files produced and relevant files.
12/14/2018	T. Carter. White	0.60			0.60		\$ 291.00	Review and analyze plaintiff's issues with redactions and email R. Aldrich and T. Lu regarding same.
12/14/2018	Tony K. Lu	0.30			0.30		\$ 120.00	Attention to and respond to C. White re: redaction inquiry from plaintiff's counsel (0.3).
12/17/2018	Suzanne D. Smith	2.90					\$ 957.00	Search database for 4 patient names with patient numbers
12/17/2018	T. Carter. White	0.60			0.60		\$ 291.00	Analyze how to replace patient names with patient numbers.
12/18/2018	T. Carter. White	0.60			0.60		\$ 291.00	Email K. Rodriguez regarding redaction issues (0.2); review and analyze abortion docs for relevance (0.4).
12/18/2018	Jae K. Park	0.50			0.50		\$ 295.00	Conference call with L. Singer regarding further analysis of plaintiff's claims on abortion issue.
12/20/2018	T. Carter. White	0.80			0.80		\$ 388.00	Review and analyze abortion emails for relevance.
12/27/2018	Jae K. Park	0.50			0.50		\$ 295.00	Conference with L. Singer regarding expert report.
1/2/2019	Jae K. Park	3.70			3.70		\$ 2,238.50	Cross-reference audit files and medical records submitted for audit with abortion files to determine whether any abortion files were submitted as part of Medicaid audit.
1/3/2019	Jae K. Park	3.40			3.40		\$ 2,057.00	Continue review of medical records submitted for audit with abortion files to determine whether any abortion files were submitted as part of Medicaid audit (2.6); review and analyze previously produced abortion records (.8).
1/4/2019	T. Carter. White	0.40			0.40		\$ 230.00	Draft summary and analysis of abortion records review.
1/4/2019	Kristen C. Rodriguez	0.20			0.20		\$ 151.00	Correspondence regarding review of phase II documents.
1/14/2019	T. Carter. White	0.30			0.30		\$ 172.50	Email K. Rodriguez regarding additional redactions to emails.
1/16/2019	T. Carter. White	1.90			1.80		\$ 1,092.50	Call with K. Rodriguez regarding document redactions (.2); review and analyze OCP billing records to match missing patient numbers with names for redactions (.8); review and analyze R. Sangiacomo share drive for abortion billing records (.7); import R. Sangiacomo emails regarding PPH case (.1).
1/16/2019	Kristen C. Rodriguez	0.20			0.20		\$ 151.00	Analysis regarding confidentiality designation on production.
1/17/2019	T. Carter. White	0.50			0.50		\$ 287.50	Review and analyze R. Sangiacomo emails for abortion spreadsheets.
1/18/2019	Kristen C. Rodriguez	0.60	0.60				\$ 453.00	Revise stipulation regarding Phase II discovery.
1/18/2019	T. Carter. White	1.70			1.70		\$ 977.50	Review and analyze R. Sangiacomo emails and PPH spreadsheets for patient numbers (.7); mark revised redactions on contested documents (1).
1/22/2019	Alan S. Gilbert	0.50	0.50				\$ 565.00	Review and edit draft stipulation.
1/24/2019	Jae K. Park	0.50			0.30	0.20	\$ 302.50	Review early draft of expert report prepared by Ms. Lissa Singer (.3); conference call with Ms. Lissa Singer regarding same (.2).
2/6/2019	T. Carter. White	0.90			0.90		\$ 517.50	Mark redactions and send to R. Aldrich for supplemental production.
2/7/2019	Jae K. Park	0.30				0.30	\$ 181.50	Communicate with Lissa Singer regarding status of expert report.
2/21/2019	T. Carter. White	0.10			0.10		\$ 57.50	Follow up with R. Aldrich re: supplemental production.
2/25/2019	Jae K. Park	1.00			1.00		\$ 605.00	Review revised draft of expert report prepared by Ms. Lissa Singer.
2/26/2019	Jae K. Park	0.80			0.30	0.50	\$ 484.00	Extended telephone conference with Ms. Lissa Singer regarding status of expert report (.5); review files and forward additional requested information and documentation to Ms. Lissa Singer (.3).
3/12/2019	Jae K. Park	0.70			0.20	0.50	\$ 423.50	Prepare letter to expert Lissa Singer (.5); consider strategy for expert report (.1); email correspondence with Kristen Rodriguez regarding same (.1).
3/12/2019	Kristen C. Rodriguez	0.20			0.20		\$ 151.00	Correspondence with J. Park regarding expert status.
3/12/2019	Ryan Aldrich	0.80					\$ 248.00	Work with case team to finalize production specifications and input; Build and validate production searches; Prepare production according to specifications and QC final deliverable; Draft and circulate summary to case team; Update review database as appropriate

Date	Name / Invoice Number	Hours	Plds, Mtn, Brief	Research	Investigation	Interviewing	Amount	Description
3/14/2019	Jae K. Park	1.00			1.00		\$ 605.00	Conference with Ms. Kristen Rodriguez regarding expert Lissa Singer and strategy for report.
3/20/2019	Jae K. Park	1.50			1.00	0.50	\$ 907.50	Review revised draft expert report (1); telephone conference with Ms. Lissa Singer regarding same and further strategy (.5).
3/25/2019	Jae K. Park	0.50			0.50		\$ 302.50	Email report to Ms. Kristen Rodriguez regarding results of telephone conference with Ms. Lissa Singer over expert report and completion of expert tasks.
3/25/2019	Kristen C. Rodriguez	0.30			0.30		\$ 226.50	Correspondence regarding expert report.
3/26/2019	T. Carter. White	0.50			0.50		\$ 287.50	Review redacted documents and prepare production email (.4); conference with K. Rodriguez re production strategy (.1).
3/26/2019	Kristen C. Rodriguez	0.20			0.20		\$ 151.00	Correspondence with client.
3/29/2019	Tony K. Lu	0.20			0.20		\$ 99.00	Teleconference with Marjorie Easter (.2)
4/1/2019	T. Carter. White	1.50	1.50				\$ 862.50	Review and analyze SJ opinion (.8); draft summary of same (.7).
4/1/2019	Jae K. Park	0.40	0.40				\$ 242.00	Review and analyze court's order granting motion for summary judgment of Thayer's oral contraceptives claim.
4/1/2019	Tony K. Lu	0.40	0.40				\$ 198.00	Review and analyze Judge Jarvey opinion on motion for summary judgment (.4)
4/1/2019	Kristen C. Rodriguez	1.00	1.00				\$ 755.00	Review and analyze summary judgment phase I decision (.8); correspondence with client (.2).
4/3/2019	Alan S. Gilbert	0.40					\$ 452.00	Conference with K. Rodriguez regarding possible settlement.
4/3/2019	Jae K. Park	0.40	0.40				\$ 242.00	Collect summary judgment papers (.2); email to client (.2).
4/3/2019	T. Carter. White	0.80	0.80				\$ 460.00	Review prior scheduling orders and analyze for next steps.
4/3/2019	Alan S. Gilbert	0.60			0.60		\$ 678.00	Telephone conference with Casey Martin.
4/4/2019	T. Carter. White	1.10					\$ 632.50	Review write-ups of firm victory (.3); draft similar summary of SJ decision (.3); revise same based on comments from K. Rodriguez (.2); calculate potential damages avoided (.3).
4/4/2019	Suzanne D. Smith	5.20					\$ 1,768.00	Review produced abortion spreadsheet (3.4); gather charge data for K. Rodriguez (1.8).
4/5/2019	Suzanne D. Smith	4.30					\$ 1,462.00	Review produced abortion spreadsheet (3); calculate fee totals for K. Rodriguez review (1.3).
4/6/2019	Jae K. Park	1.00	1.00				\$ 605.00	Collect all briefs and motions related to Thayer's motion for summary judgment (.7); draft email to client (.3).
4/8/2019	Kristen C. Rodriguez	1.00			1.00		\$ 755.00	Settlement analysis.
4/9/2019	Suzanne D. Smith	5.10					\$ 1,734.00	Calculate charges for initial visit or OCP following abortion
4/12/2019	Alan S. Gilbert	0.20					\$ 226.00	Conference K. Rodriguez regarding possible settlement.
4/12/2019	Jae K. Park	0.30			0.30		\$ 181.50	Review and analyze court's scheduling order (.1); consider and analyze potential settlement of phase two (.2).
4/14/2019	Suzanne D. Smith	1.80					\$ 612.00	Finalize patient fee spreadsheet for review by K. Rodriguez
4/15/2019	Suzanne D. Smith	3.30					\$ 1,122.00	Finalize patient statistics for review by K. Rodriguez
4/15/2019	Jae K. Park	6.80		4.60	2.20		\$ 4,114.00	Review file and analyze settlement value of abortion claim (2.2); legal research regarding proper calculation of penalties and damages (4.6).
4/17/2019	Jae K. Park	5.90		2.00	3.90		\$ 3,569.50	Continue to analyze settlement value of abortion claim (1.2); related legal research (2); draft memorandum regarding same (2); review and analyze draft expert report (.7).
4/17/2019	Kristen C. Rodriguez	0.60			0.60		\$ 453.00	Analysis of settlement calculations.
4/18/2019	Kristen C. Rodriguez	0.70			0.70		\$ 528.50	Analysis regarding settlement calculations.
4/18/2019	Suzanne D. Smith	4.20					\$ 1,428.00	Telephone call with K. Rodriguez to discuss further statistics relating to abortions/visit charges (.3); update spreadsheet and totals (3.9)
4/18/2019	Jae K. Park	1.50		1.50			\$ 907.50	Further research and analysis of potential scope of settlement and government's ability to intervene in settlement between Relator and defendant in False Claims Act matter.
4/19/2019	Suzanne D. Smith	0.90					\$ 306.00	Review abortion spreadsheet to determine patients with multiple abortions, follow up visits, and prescriptions ordered
4/19/2019	Kristen C. Rodriguez	0.90			0.90		\$ 679.50	Analysis of settlement calculations.
4/19/2019	Jae K. Park	2.50		2.10	0.40		\$ 1,512.50	.4); further research regarding logistics of settling in case with relator without government intervenor (2.1).
4/21/2019	Kristen C. Rodriguez	0.30			0.30		\$ 226.50	Correspondence with client.

Date	Name / Invoice Number	Hours	Plds, Mtn, Brief	Research	Investigation	Interviewing	Amount	Description
4/21/2019	Suzanne D. Smith	1.00					\$ 340.00	Finalize 30 day spreadsheet (.9); forward K. Rodriguez spreadsheet and totals (.1).
4/22/2019	Suzanne D. Smith	0.40					\$ 136.00	Update spreadsheet to include information regarding sample patients
4/22/2019	Alan S. Gilbert	1.50					\$ 1,695.00	Attention to possible settlement, including review of spreadsheet of post-abortion billing and conference with K. Rodriguez.
4/22/2019	Jae K. Park	4.70		2.10	2.60		\$ 2,843.50	Further research and analysis of logistics, standards, and procedure for settling qui tam actions where government does not intervene (2.1); recalculate potential range of damages to determine settlement value (1.9); update email memorandum regarding same (.7).
4/25/2019	Suzanne D. Smith	0.50					\$ 170.00	Review spreadsheet (.4); submit additional calculations to Kristen (.1).
4/25/2019	T. Carter. White	0.10			0.10		\$ 57.50	Call K. Rodriguez re: scheduling order.
4/26/2019	Jae K. Park	5.50			5.50		\$ 3,327.50	Draft memorandum analyzing settlement options (5.3); conference with Ms. Kristen Rodriguez regarding same. (.2)
4/26/2019	T. Carter. White	1.30	1.30				\$ 747.50	Draft proposed scheduling order based on review of prior orders and calendar (1); revise same and forward to K. Rodriguez (.3).
4/27/2019	Jae K. Park	0.70			0.70		\$ 423.50	Further revise and supplement memorandum regarding settlement with Thayer.
4/29/2019	Alan S. Gilbert	1.00					\$ 1,130.00	Review and edit settlement memorandum.
4/29/2019	T. Carter. White	0.90	0.90				\$ 517.50	Review and analyze motion for reconsideration.
4/29/2019	Kristen C. Rodriguez	1.80	1.10		0.70		\$ 1,359.00	Prepare draft scheduling order (.4), correspondence with client (.2), review motion (.5); edit and finalize settlement analysis memo (.7).
4/30/2019	Kristen C. Rodriguez	0.40	0.40				\$ 302.00	Analysis of scheduling order and stipulation for phase II.
4/30/2019	T. Carter. White	0.90	0.90				\$ 517.50	Analyze potential response to arguments in motion for reconsideration.
4/30/2019	Alan S. Gilbert	0.30					\$ 339.00	Conference with K. Rodriguez regarding possible settlement offer.
5/1/2019	Suzanne D. Smith	2.50					\$ 850.00	Update abortion fee spreadsheet to include 31-60 days of visit charges
5/1/2019	Jae K. Park	3.50	0.20	2.60	0.70		\$ 2,117.50	Review proposed stipulation regarding scope of discovery (.2); analyze and consider need for fact discovery and anticipated motion for summary judgment (.5); conference with team regarding same (.2); research global period for abortion procedures (2.6).
5/1/2019	T. Carter. White	1.90	1.90				\$ 1,092.50	Meet and confer with Plaintiffs' counsel regarding proposed scheduling order (1); conference with K. Rodriguez regarding same and opposition to motion for reconsideration (.9).
5/1/2019	Alan S. Gilbert	0.40	0.40				\$ 452.00	Review Thayer motion for reconsideration of summary judgment order.
5/1/2019	Alan S. Gilbert	0.40	0.40				\$ 452.00	Review and comment upon proposed schedule.
5/1/2019	Kristen C. Rodriguez	2.80	2.10		0.70		\$ 2,114.00	Prepare for and attend meet and confer with plaintiff's counsel regarding Phase II, and follow up correspondence and analysis (2.1); analysis regarding global periods listed in federal register (.7).
5/2/2019	Kristen C. Rodriguez	1.50	1.00		0.50		\$ 1,132.50	Review edits to stipulation received from plaintiff's counsel, and analysis regarding same (.4); conference with A. Gilbert and team regarding waiver of fact discovery (.5); draft scheduling order. (.6)
5/2/2019	T. Carter. White	1.00	0.80		0.20		\$ 575.00	Review and comment on revised stipulation and scheduling order (.2); conferences with team regarding strategy for discovery (.2); put together resistance to motion for reconsideration (.6).
5/2/2019	Alan S. Gilbert	0.30	0.30				\$ 339.00	Conference with K. Rodriguez regarding scheduling order.
5/2/2019	Kamie Oehrle	1.50					\$ 465.00	Research Federal Register entries from 2006 to 2008 updating the global periods in effect for various surgical procedures, per request from Kristen Rodriguez.
5/2/2019	Suzanne D. Smith	1.80					\$ 612.00	Revise abortion spreadsheet to include 31-60 day charges
5/3/2019	T. Carter. White	2.10	0.40	1.70			\$ 1,207.50	Review and comment on proposed scheduling order and stipulation (.4); research legal standards for motion for reconsideration and whether re-argument or new arguments are allowed (1.7).

Date	Name / Invoice Number	Hours	Plds, Mtn, Brief	Research	Investigation	Interviewing	Amount	Description
5/3/2019	Jae K. Park	2.00	0.90		1.10		\$ 1,210.00	Multiple email communications regarding stipulation on Phase 2 discovery and proposed scheduling order (.9); email conference with team regarding strategy for scheduling conference and discovery (1.1).
5/3/2019	Kristen C. Rodriguez	2.50	1.90		0.60		\$ 1,887.50	Draft revised stipulation and scheduling order (.9); calls to client (.6); conference with opposing counsel regarding stipulation and scheduling order (.5); finalize and file scheduling order and stipulation (.5).
5/5/2019	T. Carter. White	2.60		2.20	0.40		\$ 1,495.00	Research cases allowing courts to give weight to disputed testimony on SJ motions (2.2); analyze admissions made by PPH re prescription drug orders (.4).
5/6/2019	T. Carter. White	4.60	3.50	1.10			\$ 2,645.00	Research circumstances where change in legislation represents change in law vs.clarification of the law (1.1); draft resistance to motion for reconsideration (2.5); prepare for scheduling conference with review and analysis of proposed scheduling order and stipulation (.7); conference re preparation for hearing (.3).
5/6/2019	Jae K. Park	1.30	1.30				\$ 786.50	Prepare for scheduling conference.
5/6/2019	Alan S. Gilbert	0.30	0.30				\$ 339.00	Review draft stipulation and scheduling order.
5/6/2019	Kristen C. Rodriguez	0.70	0.70				\$ 528.50	Prepare for hearing, including correspondence with local counsel re same and team meeting.
5/7/2019	Kristen C. Rodriguez	1.30	1.30				\$ 981.50	Prepare for and attend hearing (1.2); follow up correspondence re: same (.1).
5/7/2019	Alan S. Gilbert	0.30	0.30				\$ 339.00	Review court order regarding status conference and schedule.
5/7/2019	Jae K. Park	3.00	1.20		1.80		\$ 1,815.00	Prepare for and attend scheduling conference (1.2); email to team regarding key dates (.2); consider and analyze strategy to complete discovery and prepare summary judgment motions (1.6).
5/7/2019	T. Carter. White	1.20	1.20				\$ 690.00	Prepare for and attend status conference re: scheduling of Phase II discovery.
5/8/2019	Suzanne D. Smith	0.90					\$ 306.00	Review Plaintiffs Summary Judgment briefing regarding responses to statements of undisputed facts
5/8/2019	Alan S. Gilbert	1.70	1.70				\$ 1,921.00	Review and edit draft response to motion for reconsideration.
5/8/2019	Jae K. Park	1.00	1.00				\$ 605.00	Review draft resistance to Thayer's motion for reconsideration.
5/8/2019	T. Carter. White	1.00	1.00				\$ 575.00	Revise resistance to motion for reconsideration of summary judgment order.
5/9/2019	Kristen C. Rodriguez	1.60	1.60				\$ 1,208.00	Review and edit motion to reconsider response.
5/9/2019	T. Carter. White	1.60	1.60				\$ 920.00	Revise resistance to Thayer's motion for reconsideration based on comments from A. Gilbert and review of order and brief.
5/9/2019	Jae K. Park	2.20	1.90		0.30		\$ 1,331.00	Review and revise resistance to Thayer's motion for reconsideration (1.9); draft email report to client (.3).
5/10/2019	Kristen C. Rodriguez	1.00	1.00				\$ 755.00	Review and finalize response to motion for reconsideration.
5/10/2019	Alan S. Gilbert	0.50	0.50				\$ 565.00	Review changes to response to motion for reconsideration.
5/10/2019	T. Carter. White	1.60	1.60				\$ 920.00	Revise resistance brief to incorporate edits from K. Rodriguez and J. Park (.8); proofread and cite-check same (.7); arrange for filing of same (.1).
5/11/2019	Jae K. Park	4.70			4.70		\$ 2,843.50	Work on expert report.
5/13/2019	Kristen C. Rodriguez	1.50	1.50				\$ 1,132.50	Review and finalize motion to reconsider response.
5/13/2019	Alan S. Gilbert	0.20	0.20				\$ 226.00	Review K. Rodriguez edit of section of response.
5/13/2019	T. Carter. White	0.90	0.90				\$ 517.50	Confirm formatting of Resistance based on review of local rules (.3); revise brief based on comments from local counsel and K. Rodriguez (.4); assist with finalizing and filing same (.2).
5/14/2019	T. Carter. White	0.40			0.40		\$ 230.00	Review and analyze updated interrogatory response.
5/14/2019	Kristen C. Rodriguez	1.10			1.10		\$ 830.50	Correspondence regarding 4th interrogatory answer and expert deadlines and analysis regarding same.
5/15/2019	Kristen C. Rodriguez	0.20			0.20		\$ 151.00	Correspondence regarding settlement authority.
5/15/2019	Jae K. Park	0.50			0.50		\$ 302.50	Review and analyze plaintiff's fourth supplemental response to Planned Parenthood of the Heartland's interrogatories.
5/16/2019	Alan S. Gilbert	0.50					\$ 565.00	Conference with K. Rodriguez regarding negotiating possible settlement.
5/17/2019	Ian Beste	0.50					\$ 165.00	Conduct legal research to determine availability of one title on Federal Tort Claims Act litigation at the request of Carter White.

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Date	Name / Invoice Number	Hours	Plds, Mtn, Brief	Research	Investigation	Interviewing	Amount	Description
5/17/2019	T. Carter. White	1.10		1.10			\$ 632.50	Research settlement under the FCA, especially where the government has not intervened.
5/17/2019	Kristen C. Rodriguez	0.50			0.50		\$ 377.50	Analysis regarding settlement structure.
5/18/2019	Jae K. Park	5.20			0.50		\$ 3,146.00	Continue working on expert report.
5/20/2019	Alan S. Gilbert	0.50					\$ 565.00	Conference with K. Rodriguez regarding possible settlement.
5/20/2019	T. Carter. White	1.10		1.10			\$ 632.50	Research settlement issues in qui tam litigation (.8); draft email summarizing same (.3).
5/23/2019	Jae K. Park	0.50				0.50	\$ 302.50	Telephone conference with Ms. Lissa Singer regarding case status and further strategy.
5/28/2019	Jae K. Park	2.50			2.50		\$ 1,512.50	Continue working on expert report.
5/29/2019	Kristen C. Rodriguez	0.50			0.50		\$ 377.50	Attention to 4th supplemental interrogatory response.
6/3/2019	Jae K. Park	0.80			0.80		\$ 484.00	Consider and analyze strategy for settlement (.3); prepare for and attend conference call with client (.5).
6/4/2019	Kristen C. Rodriguez	0.50			0.50		\$ 377.50	Prepare for settlement negotiations
6/5/2019	Tony K. Lu	0.10	0.10				\$ 49.50	Review Judge Jarvey decision on motion for reconsideration (.1)
6/5/2019	Kristen C. Rodriguez	1.40	0.50		0.90		\$ 1,057.00	Analysis of 4th Supplemental interrogatory response (.9); analysis of motion to reconsider ruling (.5).
6/5/2019	Jae K. Park	0.30	0.30				\$ 181.50	Review and analyze court's order denying Thayer's Motion for Reconsideration.
6/5/2019	Alan S. Gilbert	0.50	0.50				\$ 565.00	Review order on motion for reconsideration.
6/6/2019	Alan S. Gilbert	0.10					\$ 113.00	Conference with K. Rodriguez regarding settlement call with plaintiff's counsel.
6/6/2019	Jae K. Park	1.00			0.40	0.60	\$ 605.00	Prepare for and participate in settlement discussion with Thayer's counsel (.4); communicate with expert regarding finalizing expert report and provide documents requested by same (.6).
6/6/2019	Kristen C. Rodriguez	0.60			0.60		\$ 453.00	Prepare for and attend call with plaintiff's counsel regarding settlement (.4); follow up analysis regarding same (.2).
6/10/2019	T. Carter. White	0.30	0.30				\$ 172.50	Review and analyze opinion denying motion for reconsideration.
6/11/2019	Jae K. Park	0.90				0.90	\$ 544.50	Prepare for and hold telephone conference with Lissa Singer regarding finalizing expert report.
6/14/2019	Kristen C. Rodriguez	0.40			0.40		\$ 302.00	Review settlement letter from relator and correspondence with client.
6/14/2019	Jae K. Park	0.90			0.90		\$ 544.50	Review and analyze plaintiff's settlement demand (.3); review plaintiff's expert report (.5); forward report to expert (.1).
6/14/2019	T. Carter. White	1.80		1.00	0.80		\$ 1,035.00	Review and analyze settlement offer (.3); review and analyze plaintiff's expert report (.5); research basis for penalties under FCA (1).
6/17/2019	Shreya Santhanam	2.00					\$ 730.00	Learn about project, review background information and referenced cases, develop plan for research projects.
6/17/2019	Kristen C. Rodriguez	1.00			1.00		\$ 755.00	Prepare for team meeting.
6/17/2019	Jae K. Park	1.20			1.20		\$ 726.00	Prepare for and hold telephone conference regarding case status and strategy and response to Thayer's settlement demand (.8); consider and analyze same (.2); email to team regarding expert report (.2).
6/17/2019	T. Carter. White	2.60		1.90	0.70		\$ 1,495.00	Conference with K. Rodriguez etc. regarding strategy for settlement, expert discovery, and summary judgment briefing (.7); review prior research on FCA settlement with or without government (.8); manage research into FCA settlement issues where government has not intervened (1.1).
6/18/2019	T. Carter. White	1.60			1.60		\$ 920.00	Review and analyze PPH expert report.
6/19/2019	T. Carter. White	1.40		0.20	1.20		\$ 805.00	Review and analyze PPH expert report, Knau interrogatory responses, and her expert report (.9); compile documents for use in Knau deposition prep (.3); manage research into government settlement issues (.2).
6/19/2019	Shreya Santhanam	4.40					\$ 1,606.00	Research government's ability to settle FCA cases they haven't intervened in. Find cases where the government intervened just to settle or while the relators' case was pending appeal.
6/19/2019	Biljana Dosen	0.50					\$ 182.50	Met with supervising attorney Kristen Rodriguez to discuss research in support of summary judgment motion
6/20/2019	T. Carter. White	2.10		1.70	0.40		\$ 1,207.50	Review and analyze research on government's need to intervene before settling an FCA case (.8); draft summary of same (.9); review and analyze interrogatory responses regarding abortion unbundling (.4).

Time Entry Records in
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Date	Name / Invoice Number	Hours	Plds, Mtn, Brief	Research	Investigation	Interviewing	Amount	Description
6/21/2019	T. Carter. White	2.20		0.30	1.90		\$ 1,265.00	Review and analyze Knau interrogatory response and report (.7); based on same, comment on Singer report and analyze defenses to Knau's arguments (1.2); draft email summarizing research on government intervention (.3).
6/21/2019	Jae K. Park	1.00			0.50	0.50	\$ 605.00	Conference with expert Lissa Singer regarding finalizing expert report (.5); analyze C. White's suggestions and comments (.3); email exchange with C. White regarding further strategy for finalizing expert report (.2).
6/21/2019	Alan S. Gilbert	0.30					\$ 339.00	E-mails regarding settlement.
6/21/2019	Kristen C. Rodriguez	0.30			0.30		\$ 226.50	Review and analyze research regarding settlement approaches when government does not intervene.
6/24/2019	Kristen C. Rodriguez	0.50			0.50		\$ 377.50	Prepare for and call with client.
6/24/2019	T. Carter. White	0.70			0.70		\$ 402.50	Review Knau report and analyze billing patterns.
6/24/2019	Biljana Dosen	0.70					\$ 255.50	Research Hyde Amendment and relevant regulations, legislative histories, and secondary sources (.3). Review Internet sources and news articles for background on Hyde Amendment history, effect, and recent controversy (.4).
6/25/2019	T. Carter. White	0.60			0.60		\$ 345.00	Compile relevant patient records (.3); begin review and analysis of same (.3).
6/25/2019	Shreya Santhanam	0.60					\$ 219.00	Research for PPH case: look for cases that deal with dismissing a case on appeal based on a settlement agreement
6/25/2019	Suzanne D. Smith	2.00					\$ 680.00	Prepare electronic patient files for review.
6/26/2019	Shreya Santhanam	2.50					\$ 912.50	Research cases related to settlement issue
6/26/2019	Caroline E. Reigart	0.50					\$ 205.00	Provide guidance and advice to B. Dosen related to Medicaid research.
6/26/2019	Alan S. Gilbert	0.70					\$ 791.00	Conference with K. Rodriguez regarding settlement issues.
6/26/2019	T. Carter. White	0.40		0.20	0.20		\$ 230.00	Manage research into government's ability to settle while appeal is pending (.2); continue review and analysis of patient records (.2).
6/26/2019	Biljana Dosen	0.80					\$ 292.00	Discuss research strategy concerning False Claims Act summary judgment motion with Health Care Managing Associate Caroline Reigart
6/26/2019	Jae K. Park	1.40			1.00	0.40	\$ 847.00	Review and analyze revised draft of expert report (1); conference with L. Singer regarding same (.4).
6/26/2019	Kristen C. Rodriguez	0.80			0.80		\$ 604.00	Review and analysis of draft expert report.
6/27/2019	Kristen C. Rodriguez	0.50			0.50		\$ 377.50	Review 4th supplement to interrogatory responses in phase 2.
6/27/2019	T. Carter. White	0.40		0.20	0.20		\$ 230.00	Analyze settlement strategy based on research into government settlement intervention (.1); review and analyze patient records (.1); review and analyze research regarding ability to dismiss appeal with settlement (.2).
6/27/2019	Shreya Santhanam	0.90					\$ 328.50	Research cases for PPH related to using settlement agreements to dismiss appeals.
6/28/2019	Biljana Dosen	0.50					\$ 182.50	Pull and save all relevant case documents from e-mail
6/28/2019	Jae K. Park	0.80		0.50	0.30		\$ 484.00	Confer with team regarding strategy for expert report (.3); review and analyze C. White's research and analysis regarding settlement strategy (.5).
6/28/2019	T. Carter. White	0.60		0.40	0.20		\$ 345.00	Review and analyze research on dismissing appeal as a part of a settlement (.2); draft summary of same (.2); review and analyze updates to our expert report (.2).
7/1/2019	Jae K. Park	1.00		0.40	0.60		\$ 605.00	Review research and analysis prepared by C. White regarding settlement of False Claims Act cases (.4); telephone conference with team regarding case status and further strategy on settlement and expert report (.6).
7/1/2019	T. Carter. White	0.40			0.40		\$ 230.00	Review and analyze updates to expert report.
7/1/2019	Biljana Dosen	0.90					\$ 328.50	Review articles and relevant case documents
7/2/2019	Biljana Dosen	4.90					\$ 1,788.50	Review (1) Iowa Department of Human Services Physician Services Provider Manual, (2) Iowa Department of Human Services Maternal Health Center Provider Manual, (3) Third Amended Complaint, (4) Plaintiff's Fourth Supplemental Answer to Defendant's First Set of Interrogatories, and (5) Plaintiff's Supplemental Answer to Defendant's Interrogatories re Expert Witness.

Date	Name / Invoice Number	Hours	Plds, Mtn, Brief	Research	Investigation	Interviewing	Amount	Description
7/2/2019	Biljana Dosen	1.10					\$ 401.50	Review Consolidated Appropriations Act 2010 (.3). Search Code of Federal Regulations on federal Medicaid funding and Iowa Administrative Codes on Medicaid-covered provider services (.5). Create table of patients with respective CPT and ICD-9 Codes (.3).
7/2/2019	Kristen C. Rodriguez	0.40			0.40		\$ 302.00	Call with client.
7/9/2019	Biljana Dosen	4.10					\$ 1,496.50	Continue review of Medicaid regulations (.9); research Iowa Medicaid rules and analyze possible arguments in support of summary judgment motion (1); conduct legal analysis of authoritative case law and relevant health care law professional blogs (1.5); begin initial organization of draft memorandum. (.7)
7/9/2019	Kristen C. Rodriguez	0.20			0.20		\$ 151.00	Correspondence with client.
7/10/2019	Jae K. Park	1.40			0.80	0.60	\$ 847.00	Review and analyze updated expert report (.5); telephone conference with Lissa Singer regarding same and further strategy (.6); report to team regarding report (.3).
7/10/2019	Biljana Dosen	2.50					\$ 912.50	Phone conference with supervising partner Kristen Rodriguez regarding status of summary judgment research (.4); review draft expert report in support of summary judgment (.4); research historical Iowa Provider Manuals and CPT codes (1.7).
7/10/2019	T. Carter. White	0.70			0.70		\$ 402.50	Review patient records in the context of expert reports.
7/11/2019	Kristen C. Rodriguez	2.50			2.50		\$ 1,887.50	Analysis and review of expert report (2); meet with B. Dosen regarding same (.5).
7/11/2019	T. Carter. White	1.30			1.30		\$ 747.50	Review patient records in the context of expert reports and plan deposition questions (1.1); research production history of Medicaid manuals (.2).
7/11/2019	Biljana Dosen	0.30					\$ 109.50	Collaborate with health care associate and other attorneys to locate historical Medicaid Provider Manuals
7/11/2019	Biljana Dosen	7.00					\$ 2,555.00	Continue research in support of summary judgment on False Claims Act claims, including study of provider specific policies in 2006 IME Family Planning Manual and Physician Services Provider Manual 2003 (1.5); search for CPT codes for billed procedures using Physician Fee Schedule Search (1.4); begin comparing expert report of patient events with plaintiffs' version of patient events and develop chart (1.8); research global surgical period and its possible relevance to summary judgment motion, including study of Medicare Claims Processing Manual (1.4); search for potentially relevant cases (.9).
7/11/2019	Caroline E. Reigart	0.70					\$ 287.00	Correspond with B. Dosen regarding question about Iowa Medicaid and historical resources.
7/12/2019	T. Carter. White	0.80			0.80		\$ 460.00	Review patient records in the context of expert reports and plan deposition questions (.6); review and comment on our expert report (.2).
7/12/2019	Kristen C. Rodriguez	1.50		1.00	0.50		\$ 1,132.50	Meeting with B. Dosen regarding research for summary judgment (1); call with plaintiff's counsel regarding settlement (.3); call with client (.2).
7/12/2019	Biljana Dosen	4.20					\$ 1,533.00	Meeting with supervising attorney Kristen Rodriguez to discuss research progress and findings (1); begin drafting research report in support of summary judgment motion (2.3); review and edit expert report and provide feedback on areas needing improvement (.9).
7/12/2019	Jae K. Park	0.70			0.70		\$ 423.50	Multiple email exchanges with team regarding expert report and areas to further revise and address.
7/13/2019	Jae K. Park	0.80			0.80		\$ 484.00	Add comments to draft expert report.
7/15/2019	Kristen C. Rodriguez	3.30			3.30		\$ 2,491.50	Review and analyze expert report (1.7); call with team regarding same (1.2); follow up analysis regarding same (.4).
7/15/2019	Biljana Dosen	2.40					\$ 876.00	Discussion/strategy meeting on expert report with Kristen Rodriguez, Jae Park, and Carter White (1.2) compile meeting minutes and send to meeting members along with updated patient chart (1.2).
7/15/2019	Biljana Dosen	4.50					\$ 1,642.50	Continue drafting research report in support of summary judgment motion (3.2); prepare comments/edits on expert report and send to Jae Park, Kristen Rodriguez, and Carter White in advance of meeting (1.3).

Date	Name / Invoice Number	Hours	Plds, Mtn, Brief	Research	Investigation	Interviewing	Amount	Description
7/15/2019	Alan S. Gilbert	1.30			1.30		\$ 1,469.00	Review, comment and edit draft Singer expert report.
7/15/2019	T. Carter. White	1.20			1.20		\$ 690.00	Team call regarding expert reports and depositions and strategy for same.
7/15/2019	Jae K. Park	1.50			1.50		\$ 907.50	Review and analyze team edits to expert report (.3); team conference regarding same (1.2).
7/15/2019	Suzanne D. Smith	0.30					\$ 102.00	Prepare AB spreadsheet for review by B. Dosen
7/16/2019	Biljana Dosen	3.40					\$ 1,241.00	Continue creating patient chart (1); compare expert report on patients with billing statements for accurate ICD9 codes (1.8); continue drafting legal report in support of summary judgment motion (.6).
7/16/2019	T. Carter. White	0.10			0.10		\$ 57.50	Review and analyze summaries of progress on expert report.
7/16/2019	Jae K. Park	2.50			0.70	1.80	\$ 1,512.50	Extended telephone conference with expert to finalize report (1.8); conference with client (.7).
7/17/2019	T. Carter. White	0.90			0.90		\$ 517.50	Outline Knau deposition based on review of patient records (.7); coordinate deposition scheduling (.2).
7/17/2019	Biljana Dosen	2.60					\$ 949.00	Complete research report in support of motion for summary judgment, including exhibits for same.
7/18/2019	Jae K. Park	1.30			0.90	0.40	\$ 786.50	Further work related to expert report (.7); prepare blackline to confirm edits (.2); telephone conference with Lissa Singer (.4).
7/18/2019	T. Carter. White	0.30			0.30		\$ 172.50	Work on scheduling Knau deposition.
7/18/2019	Biljana Dosen	2.60					\$ 949.00	Create patient chart referencing billing data
7/19/2019	Kristen C. Rodriguez	1.50	0.40		1.10		\$ 1,132.50	Review memo regarding summary judgment outline (.4); review near final expert report (.5); call with C. White to prep for deposition (.6).
7/19/2019	T. Carter. White	1.20			1.20		\$ 690.00	Call with K. Rodriguez regarding strategy for Knau deposition (.6); create outline of preparation steps (.3); review memo analyzing legal issues relevant to abortion issues (.3).
7/19/2019	Biljana Dosen	2.20					\$ 803.00	Review and finalize expert report, organize exhibits, and forward to K. Rodriguez (1.4); complete and submit patient organization chart (.8).
7/21/2019	Kristen C. Rodriguez	0.60			0.60		\$ 453.00	Review and analyze near final expert report.
7/22/2019	Kristen C. Rodriguez	0.40			0.40		\$ 302.00	Review and finalize expert report for service.
7/22/2019	Jae K. Park	0.40			0.40		\$ 242.00	Finalize expert report (.2); coordinate expert's final review and execution (.1); prepare cover letter providing report to Plaintiff's counsel (.1).
7/23/2019	Biljana Dosen	0.20					\$ 73.00	Provide congressional appropriations bill to associate to assist with summary judgment motion.
7/23/2019	T. Carter. White	0.70		0.20	0.50		\$ 402.50	Start compiling legal bases for expert reports based on review of same and on prior research memos (.5); coordinate research regarding expert privileges (.2).
7/24/2019	T. Carter. White	0.40			0.40		\$ 230.00	Outline goals for Knau deposition.
7/25/2019	T. Carter. White	0.70			0.70		\$ 402.50	Review and analyze legal rules governing Medicaid payments for abortions (.2); strategize on goals for Knau deposition (.5).
7/26/2019	Jae K. Park	0.40			0.40		\$ 242.00	Consider and analyze strategy for expert depositions (.3); email to attorney K. Rodriguez and C. White regarding strategy (.1).
7/26/2019	T. Carter. White	1.80			1.80		\$ 1,035.00	Review and analyze Medicaid Provider Manual and global period booklet (.6); update deposition goals list and circulate for comment (.3); review and analyze final expert reports (.9).
7/29/2019	Jae K. Park	0.40			0.40		\$ 242.00	Telephone conference with L. Singer regarding sources of her analysis (.3); email with attorney C. White regarding same (.1).
7/29/2019	T. Carter. White	1.30		0.90	0.40		\$ 747.50	Research examples of prior W. Knau depositions (.9); draft notice of Knau deposition (.2); conference with N. Hassan regarding privilege research (.2).
7/29/2019	Noor-ul-ain Hasan	1.00					\$ 335.00	Reviewed expert reports ahead of research assignment.
7/30/2019	Noor-ul-ain Hasan	6.00					\$ 2,010.00	Conducted research on applicability of attorney-client privilege to testifying experts and consulting experts (4.9), conferred with partner (Kristen Rodriguez) on research assignments for remainder of summer (.5); and proofread memo before sending to associate (Carter White) (.6).
7/30/2019	T. Carter. White	3.00			3.00		\$ 1,725.00	Review prior Knau deposition testimony in FCA cases and analyze fruitful lines of questioning (1.5); review and analyze CPT and IDC-9 codes (.4); serve deposition notice for Mrs. Knau (.2); revise Knau deposition outline (.9).

Date	Name / Invoice Number	Hours	Plds, Mtn, Brief	Research	Investigation	Interviewing	Amount	Description
7/31/2019	Noor-ul-ain Hasan	6.50					\$ 2,177.50	Reviewed expert reports and analyzed research memo for summary judgment (2); created summary judgment argument outline (4.3); conferred with Associate on research question (.2).
7/31/2019	T. Carter. White	0.60			0.60		\$ 345.00	Review prior Knau depositions and revise outline.
8/1/2019	Noor-ul-ain Hasan	5.00					\$ 5.00	Refined summary judgment brief outline (2.2); continued analyzing expert report and previous pleadings to support arguments in brief (2.8).
8/1/2019	Jae K. Park	0.50			0.10	0.40	\$ 302.50	Conference with expert L. Singer regarding deposition scheduling and preparation for W. Knau deposition (.4); conference with team regarding same (.1).
8/1/2019	T. Carter. White	0.10	0.10				\$ 57.50	Review SJ outline from N. Hassan.
8/2/2019	T. Carter. White	1.00	1.00				\$ 575.00	Review and comment on SJ outline (.7); conference with N. Hassan regarding same (.3).
8/2/2019	Jae K. Park	0.40			0.10	0.30	\$ 242.00	Conference with expert L. Singer regarding support in preparation to take W. Knau's deposition (.3); meet and confer with Thayer's counsel regarding deposition of L. Singer (.1).
8/2/2019	Noor-ul-ain Hasan	5.00					\$ 1,675.00	Conferred with Associate re: feedback on summary judgment draft outline (.3); made changes to structure/organization (1.6); conducted research on Iowa state administrative statutes (3.1).
8/2/2019	Kristen C. Rodriguez	0.30	0.30				\$ 226.50	Review outline of summary judgment motion.
8/5/2019	Noor-ul-ain Hasan	4.50					\$ 1,597.50	Drafted unbundling argument section of brief (2.7); conducted research on legal Rule for what constitutes "unbundling" of services under the FCA (1.8).
8/5/2019	T. Carter. White	1.60			1.60		\$ 920.00	Review and analyze Knau deposition transcript from Tyler Vick case and revise outline based on insights from same.
8/6/2019	Noor-ul-ain Hasan	6.00					\$ 2,130.00	Drafted Argument sub-sections pertaining to PPH's lawful billing and coding practices (4.2), analyzed Plaintiff's expert report and consolidated PPH's expert report (1.8).
8/6/2019	T. Carter. White	1.20				1.20	\$ 690.00	Prepare for and call L. Singer regarding regulatory issues.
8/7/2019	T. Carter. White	3.70	0.80		2.90		\$ 2,127.50	Draft questions for Knau deposition outline (2.9); review and analyze drafts SJ brief sections (.8).
8/7/2019	Noor-ul-ain Hasan	5.50					\$ 1,952.50	Conducted research on "unbundling" schemes at the motion-to-dismiss stage and summary judgment stage (3.7); reviewed earlier pleadings from our case and motion to dismiss order (.8); revised draft of brief to incorporate additional patient information (.6); summarize research findings for associate (Carter White, Jae Park) (.4).
8/8/2019	Noor-ul-ain Hasan	3.00					\$ 1,065.00	Reviewed Plaintiff's Supplemental Interrogatory Answer (.7), revised MSJ brief to incorporate arguments on PPH's reasonable interpretation of Iowa statutes (1.9); conferred with Associate (Carter White) about next research steps (.4).
8/8/2019	T. Carter. White	5.50		0.40	5.10		\$ 3,162.50	Conference with N. Hassan regarding summary judgment brief (.4); draft questions for Knau deposition outline (4.3); review and analyze supplemental Knau report and consider strategies for rebutting new claims (.8).
8/8/2019	Kristen C. Rodriguez	0.50	0.50				\$ 377.50	Review draft summary judgment brief from summer associate.
8/9/2019	T. Carter. White	8.50			8.50		\$ 4,887.50	Review and analyze Knau supplemental report (.8); draft questions for Knau deposition based on review and analysis of patient records, billing spreadsheet, and underlying expert reports (6.9); review and analyze prior deposition testimony from former PPH contractor (.8).
8/11/2019	T. Carter. White	1.90			1.90		\$ 1,092.50	Revise Knau deposition outline based on review and analysis of Knau supplemental report.
8/12/2019	Alan S. Gilbert	0.80			0.80		\$ 904.00	Review Thayer expert supplemental report and conference K. Rodriguez regarding same.
8/12/2019	T. Carter. White	3.30			3.30		\$ 1,897.50	Review and analyze Thayer affidavits (.4); review and comment on patient billing exhibit (.5); review and analyze plans for Knau deposition exhibits (.7); update Knau deposition outline and exhibit organization based on review and analysis of same (1.7).
8/12/2019	Suzanne D. Smith	1.90					\$ 646.00	Create spreadsheet for possible use as deposition exhibit
8/12/2019	Kristen C. Rodriguez	2.50			2.50		\$ 1,887.50	Work on preparing for deposition of Knau.

Date	Name / Invoice Number	Hours	Plds, Mtn, Brief	Research	Investigation	Interviewing	Amount	Description
8/13/2019	Alan S. Gilbert	0.40			0.40		\$ 452.00	Review Thayer declaration in support of expert supplement and conference with K. Rodriguez regarding same.
8/13/2019	T. Carter. White	5.50			5.00		\$ 3,162.50	Revise Knau deposition outline and update exhibit labelling based on review of same (2.6); prepare exhibits for shipment to Iowa (.5); conference with S. Thompson regarding response to plaintiffs' allegations (.3); prepare for and call with L. Singer regarding reactions to Knau supplemental report (1.3); call with K. Rodriguez regarding deposition strategy (.4); review and analyze Thayer declaration (.4).
8/13/2019	Jae K. Park	0.50			0.50		\$ 302.50	Review and analyze research memoranda regarding abortion unbundling in support of potential motion for summary judgment and consider strategy in light of same.
8/13/2019	Kristen C. Rodriguez	2.00			2.00		\$ 1,510.00	Prepare for expert deposition.
8/14/2019	T. Carter. White	4.30			4.30		\$ 2,472.50	Review and analyze tips for taking expert deposition (1); prepare for deposition by working with exhibits and editing outline (3.3).
8/14/2019	Kristen C. Rodriguez	1.00			1.00		\$ 755.00	Prepare for deposition of plaintiff's expert.
8/14/2019	Jae K. Park	0.50			0.50		\$ 302.50	Review draft outline of deposition of Wendy Knau and provide comments on same.
8/14/2019	Alan S. Gilbert	3.00			3.00		\$ 3,390.00	Review Knau materials and conferences K. Rodriguez re: Knau deposition.
8/15/2019	Kristen C. Rodriguez	5.00			5.00		\$ 3,775.00	Travel to Des Moines for deposition of plaintiff's expert, including prep for same.
8/15/2019	T. Carter. White	6.40			5.90		\$ 3,680.00	Organize logistics for Iowa trip (.5); prepare for deposition, including editing outline and marking up exhibits (3.4); working travel to Iowa reviewing deposition outline (2.5).
8/15/2019	Jae K. Park	0.80			0.40	0.40	\$ 484.00	Multiple conferences with expert to schedule deposition (.4); consider and analyze privilege issues related to expert deposition (.4).
8/16/2019	Kristen C. Rodriguez	9.00			9.00		\$ 6,795.00	Attend deposition of plaintiff's expert.
8/16/2019	Kristen C. Rodriguez	3.00					\$ 2,265.00	Return travel from plaintiff's expert.
8/16/2019	T. Carter. White	11.00			8.00		\$ 6,325.00	Prepare for and take deposition of W.B. Knau (8); travel from deposition (3).
8/17/2019	Jae K. Park	1.30			1.30		\$ 786.50	Review and analyze Thayer's supplemental expert report.
8/19/2019	Kristen C. Rodriguez	0.20			0.20		\$ 151.00	Correspondence with team regarding expert deposition.
8/19/2019	T. Carter. White	0.50			0.50		\$ 287.50	Digest and summarize Knau deposition.
8/20/2019	Alan S. Gilbert	0.50			0.50		\$ 565.00	Conference with K. Rodriguez regarding Knau deposition and strategy.
8/21/2019	Kristen C. Rodriguez	0.50			0.50		\$ 377.50	Correspondence and analysis regarding Knau deposition and supplement.
8/21/2019	T. Carter. White	0.10			0.10		\$ 57.50	Call with L. Singer regarding W. Knau deposition.
8/22/2019	Kristen C. Rodriguez	0.30			0.30		\$ 226.50	Analysis regarding follow ups needed after Knau deposition.
8/22/2019	Jae K. Park	0.80			0.80		\$ 484.00	Telephone conference with K. Rodriguez regarding case status, strategy, and expert depositions (.5); conference with L. Singer regarding deposition preparation (.3).
8/26/2019	Kristen C. Rodriguez	0.50			0.50		\$ 377.50	Work on strategy for supplemental report.
8/26/2019	T. Carter. White	0.40			0.40		\$ 230.00	Analyze need for a supplemental report responding to W. Knau's.
8/26/2019	Jae K. Park	0.40			0.40		\$ 242.00	Review correspondence from Plaintiffs counsel regarding expert depositions (.1); consider strategy in light of same (.3).
8/28/2019	T. Carter. White	0.70			0.70		\$ 402.50	Team strategy call regarding expert discovery and summary judgment.
8/28/2019	Jae K. Park	2.20			2.20		\$ 1,331.00	Conference with team regarding strategy for preparing supplemental expert report (.3); conference with L. Singer regarding same (.8); prepare draft letter to Plaintiffs counsel regarding deposition scheduling (1.1).
8/28/2019	Alan S. Gilbert	0.40			0.40		\$ 452.00	Conference with K. Rodriguez regarding our expert and rebuttal of plaintiff's expert.
8/28/2019	Kristen C. Rodriguez	0.80			0.80		\$ 604.00	Work on expert strategy.
8/29/2019	Jae K. Park	5.50			5.50		\$ 3,327.50	Prepare for and hold telephone conference with Ms. Singer regarding preparation for expert deposition (2); work on expert deposition preparation outline (2.3); revise and supplement correspondence to plaintiff's counsel regarding deposition scheduling and expert reports (1.2).
8/29/2019	Alan S. Gilbert	0.30			0.30		\$ 339.00	Conference with K. Rodriguez regarding expert reports and depositions.
8/29/2019	Kristen C. Rodriguez	1.80			1.80		\$ 1,359.00	Call with expert to preparation for deposition (1.5); correspondence with plaintiff's counsel (.3).

Date	Name / Invoice Number	Hours	Plds, Mtn, Brief	Research	Investigation	Interviewing	Amount	Description
8/30/2019	Jae K. Park	0.80		0.50	0.30		\$ 484.00	Further correspondence with counsel for Thayer regarding deposition of Lissa Singer and dispute over reports (.3); research entitlement to expert deposition fees and local customs in Iowa regarding same (.5).
8/30/2019	Kristen C. Rodriguez	0.50			0.50		\$ 377.50	Correspondence with opposing counsel regarding supplemental report.
9/1/2019	Jae K. Park	1.80			1.80		\$ 1,089.00	Continue preparing to defend deposition of expert witness L. Singer.
9/2/2019	Erika L. Amatore	2.00					\$ 740.00	Review materials from Kristen Rodriguez regarding false claims act matter
9/2/2019	Jae K. Park	4.30			4.30		\$ 2,601.50	Continue preparing to defend deposition of expert witness L. Singer.
9/3/2019	Erika L. Amatore	3.00					\$ 1,110.00	Review background materials from Kristen Rodriguez (2.0); telephone call with Kristen Rodriguez regarding case background and motion for summary judgment (1.0)
9/3/2019	Kristen C. Rodriguez	0.50			0.50		\$ 377.50	Correspondence regarding expert discovery and next steps.
9/3/2019	Suzanne D. Smith	0.70					\$ 238.00	Review production documents for Audit patient information amd compare against Abortion records
9/4/2019	T. Carter. White	1.30			1.10		\$ 747.50	Review and analyze correspondence from TSG regarding Knau deposition (.2); review analysis of IME audit and abortion patients (.5); search for abortion medical protocol (.6).
9/4/2019	Tony K. Lu	0.20			0.20		\$ 99.00	Attention to inquiry from C. White re: PPFA S&G Protocols (.2)
9/4/2019	Kristen C. Rodriguez	0.40			0.40		\$ 302.00	Review and analyze standing order production and audit files.
9/4/2019	Erika L. Amatore	0.70					\$ 259.00	Review 2006 patient records
9/5/2019	Erika L. Amatore	2.70					\$ 999.00	Review 2006 patient records.
9/5/2019	Jae K. Park	0.70			0.70		\$ 423.50	Conference with plaintiff's counsel regarding expert depositions (.3); conference with expert L. Singer regarding same (.2); consider and analyze further strategy (.2).
9/6/2019	Kristen C. Rodriguez	0.20			0.20		\$ 151.00	Correspondence regarding status of deposition.
9/9/2019	Alan S. Gilbert	0.40			0.40		\$ 452.00	Conference with K. Rodriguez regarding strategy on summary judgment of abortion claims.
9/10/2019	Jae K. Park	0.40			0.40		\$ 242.00	Brief conference call with Lissa Singer regarding cleaning up of issues regarding her report.
9/10/2019	T. Carter. White	0.50			0.50		\$ 287.50	Mark confidentiality designations and favorable/unfavorable testimony in Knau deposition transcripts.
9/10/2019	Kristen C. Rodriguez	0.30			0.30		\$ 226.50	Various correspondence with plaintiff's counsel regarding Knau documents.
9/11/2019	Kristen C. Rodriguez	1.00			1.00		\$ 755.00	Analysis of superbills and correspondence with client (.8); correspondence with P. Dickey (.2).
9/11/2019	Tony K. Lu	0.20			0.20		\$ 99.00	Teleconference with Kristen Rodriguez re: history of production related to AB and PPFA S&Gs (.2)
9/12/2019	T. Carter. White	0.50			0.50		\$ 287.50	Mark Knau deposition transcript for confidentiality and helpful testimony.
9/13/2019	T. Carter. White	0.20			0.20		\$ 115.00	Review and analyze sample superbills.
9/13/2019	T. Carter. White	0.30			0.30		\$ 172.50	Begin review and analysis of W. Knau supporting materials.
9/13/2019	Erika L. Amatore	3.00					\$ 1,110.00	Review deposition transcript of Wendy Knau (1.3); research materiality element of false claims act (1.7).
9/16/2019	Suzanne D. Smith	3.50					\$ 1,190.00	Review Abortion Spreadsheet and create new format to include specific visits and dates.
9/16/2019	Kristen C. Rodriguez	1.20			1.20		\$ 906.00	Call with P. Dickey and follow up emails (1); email with S. smith regarding spreadsheet analysis (.2).
9/17/2019	Suzanne D. Smith	5.90					\$ 2,006.00	Review Abortion Spreadsheet and create new format to include specific visits and dates.
9/17/2019	Kristen C. Rodriguez	0.30			0.30		\$ 226.50	Calls/emails with C. White regarding transcript confidentiality designations.
9/17/2019	Erika L. Amatore	3.00					\$ 1,110.00	Research case law on materiality
9/17/2019	T. Carter. White	0.60			0.60		\$ 345.00	Work on confidentiality designations for Knau deposition.
9/18/2019	Suzanne D. Smith	6.30					\$ 2,142.00	Review Abortion Spreadsheet and create new version regarding visits and timing
9/19/2019	Suzanne D. Smith	2.80					\$ 952.00	Review Abortion Spreadsheet and create new version regarding visits and timing
9/19/2019	Kristen C. Rodriguez	3.20			3.20		\$ 2,416.00	Call with new team member for case overview (.4); correspondence with team regarding same (.1); prepare for summary judgment outline (2.7).
9/19/2019	Jae K. Park	0.50			0.50		\$ 302.50	Review and analyze abortion protocols and potential impact on defense theories.

Time Entry Records in
United States ex rel. Thayer v. Planned Parenthood of the Heartland

Date	Name / Invoice Number	Hours	Plds, Mtn, Brief	Research	Investigation	Interviewing	Amount	Description
9/19/2019	T. Carter. White	1.80			1.80		\$ 1,035.00	Collect and circulate patient billing records (.3); analyze Knau materials (.4); analyze PPH abortion follow up procedures (.3); mark Knau deposition transcript for confidentiality and relevance (.8).
9/20/2019	Suzanne D. Smith	4.80					\$ 1,632.00	Review Abortion Spreadsheet and create new version regarding visits and timing
9/20/2019	T. Carter. White	0.50			0.50		\$ 287.50	Review analysis of PPH protocols and case strategy.
9/21/2019	T. Carter. White	3.80			3.80		\$ 2,185.00	Review and analyze Knau deposition transcript for confidentiality, most helpful excerpts, and ways to use in SJ argument.
9/22/2019	Suzanne D. Smith	2.50					\$ 850.00	Review AB Spreadsheet and prepare follow-up visit spreadsheet for attorney review
9/23/2019	Suzanne D. Smith	3.90					\$ 1,326.00	Review AB Spreadsheet and create follow up visit spreadsheet for attorney review
9/23/2019	T. Carter. White	0.20			0.20		\$ 115.00	Draft letter regarding Knau deposition confidentiality.
9/24/2019	Suzanne D. Smith	4.80					\$ 1,632.00	Review AB Spreadsheet and prepare follow up spreadsheet for attorney review
9/25/2019	T. Carter. White	2.80	1.60		1.20		\$ 1,610.00	Analyze strategy for SJ brief and facts drafting (1.6); review and analyze Knau records produced at deposition (.7); review and analyze abortion protocols (.3); finalize and send W. Knau confidentiality designations (.2).
9/25/2019	Kristen C. Rodriguez	0.50			0.50		\$ 377.50	Review and analyze confidentiality designations.
9/30/2019	Kristen C. Rodriguez	3.50	3.50				\$ 2,642.50	Work on outline for SJ (2.5); team call (1).
9/30/2019	Charles C. Hayes	1.00					\$ 380.00	Planned Parenthood/Thayer matter litigation team conference call regarding upcoming assignment and deadlines.
9/30/2019	Charles C. Hayes	0.10					\$ 38.00	Conference with Jae Park about next steps in Planned Parenthood-Thayer matter.
9/30/2019	Charles C. Hayes	0.10					\$ 38.00	Review motion for summary judgment project outline in Planned Parenthood-Thayer matter. Plan next steps, due dates.
9/30/2019	T. Carter. White	1.80	1.30		0.50		\$ 1,035.00	Team call regarding strategy and next steps for SJ briefing (1); conference with K. Rodriguez regarding SJ argument strategy (.3); review and analyze W. Knau sources of information (.5).
9/30/2019	Jae K. Park	1.00	1.00				\$ 605.00	Prepare for team call regarding strategy for motion for summary adjudication and conference with Attorney C. Hayes regarding same.
9/30/2019	Suzanne D. Smith	1.00					\$ 340.00	Participate in team call regarding SJ Motion preparation
9/30/2019	Erika L. Amatore	1.50					\$ 555.00	Review materials, prepare for telephone conference call (.3); telephone conference call with MSJ team regarding strategy, research required, drafting of MSJ (1); telephone call with Kristen Rodriguez regarding same (.2)
10/1/2019	Charles C. Hayes	0.10					\$ 38.00	Review and respond to emails about rescheduling summary judgment briefing in Planned Parenthood matter.
10/1/2019	Jae K. Park	0.30	0.30				\$ 181.50	Consider and analyze Plaintiff's proposal to adjust briefing schedule for cross-motions for summary judgment.
10/1/2019	T. Carter. White	5.40	4.30		1.10		\$ 3,105.00	Review and analyze regulatory materials produced by W. Knau (1.1); draft outline of undisputed facts and facts dealing with abortion sampling, billing records and patient visits (4.1); conference with K. Rodriguez regarding issues with facts (.2).
10/1/2019	Kristen C. Rodriguez	0.20			0.20		\$ 151.00	Correspondence from plaintiff's counsel regarding discovery schedule and conference.
10/1/2019	Stephanie Peatman	7.50					\$ 2,475.00	Reviewed and analyzed case documents, including Relator's multiple complaints, expert reports and declarations to get up to speed on case.
10/2/2019	T. Carter. White	2.50	1.30		0.20		\$ 1,437.50	Review and analyze outline of SJ motion (.5); analyze new scheduling proposal (.2); continue drafting facts relating to 19 patient files (1.8).
10/2/2019	Charles C. Hayes	0.10					\$ 38.00	Review and respond to email about case documents, pleadings, and orders in Planned Parenthood case.
10/2/2019	Charles C. Hayes	0.70					\$ 266.00	Review introductory materials on Planned Parenthood-Thayer matter.
10/2/2019	Charles C. Hayes	0.50					\$ 190.00	Review introductory materials in Planned Parenthood-Thayer matter, including outline on upcoming tasks in motion for summary judgment briefing.

Date	Name / Invoice Number	Hours	Plds, Mtn, Brief	Research	Investigation	Interviewing	Amount	Description
10/2/2019	Stephanie Peatman	7.50					\$ 2,475.00	Reviewed and analyzed case documents, including prior procedural history and prior motion for summary judgment in preparation for drafting motion for summary judgment.
10/3/2019	T. Carter. White	4.90	4.60		0.10		\$ 2,817.50	Review updates on scheduling proposals (.1); coordinate payment of W. Knau (.2); continue drafting undisputed SJ facts addressing 19 patients (4.6).
10/3/2019	Stephanie Peatman	7.50					\$ 2,475.00	Conducted research regarding False Claims Act, Relator and her affiliated organization (2.9); reviewed additional case documents, including Relator's prior motion for summary judgment and supporting documents (4.6).
10/4/2019	Jae K. Park	3.70	3.70				\$ 2,238.50	Work on portion of motion for summary judgment focusing on procedural history and relevant legal standards for summary judgment, false claims act, and relevant Iowa Medicaid regulations.
10/4/2019	T. Carter. White	2.10	1.80		0.30		\$ 1,207.50	Review and comment on proposed scheduling order (.3); continue drafting undisputed facts for SJ dealing with patient files (1.7); circulate same to group (.1).
10/4/2019	Kristen C. Rodriguez	0.70	0.20	0.20	0.30		\$ 528.50	Coordinate notice of withdrawal for C. Miltich (.2); direct research regarding attorneys' fees for prevailing defendant in FCA cases (.2); review and edit draft case management order (.3).
10/4/2019	Stephanie Peatman	7.50					\$ 2,475.00	Reviewed additional case materials, including prior research memo and attached exhibits, Medicaid and medicare guidelines, and Excel spreadsheets of patient visits.
10/8/2019	Kristen C. Rodriguez	1.00	1.00				\$ 755.00	Team call and prepare for same.
10/8/2019	Erika L. Amatore	2.20					\$ 814.00	Research case law on falsity, materiality (1.7); team telephone conference re motion for summary judgment (.5).
10/8/2019	Jae K. Park	0.50	0.50				\$ 302.50	Attend team call regarding status of motion for summary judgment.
10/8/2019	Kristen C. Rodriguez	1.00	1.00				\$ 755.00	Review Statement of Facts draft.
10/8/2019	T. Carter. White	2.40	2.40				\$ 1,380.00	Continue drafting undisputed SJ facts addressing 19 patients (1.5); work on assembling SJ appendix (.4); conference with team regarding case strategy and status (.5).
10/8/2019	Suzanne D. Smith	0.60					\$ 204.00	Prepare production document (redacting portions) for use as SJ exhibit
10/8/2019	Charles C. Hayes	0.40					\$ 152.00	Weekly Planned Parenthood-Thayer conference call.
10/8/2019	Stephanie Peatman	0.30					\$ 99.00	Reviewed and analyzed statement of facts as prepared by J. Park.
10/9/2019	Wanda N. Hulsebus	0.30					\$ 42.00	Research and obtain Medicaid claims processing guide 2003 for S. Peatman
10/9/2019	Suzanne D. Smith	0.40					\$ 136.00	Review/analyze database in preparing for SJ exhibits
10/9/2019	Tony K. Lu	0.20			0.20		\$ 99.00	Attention to and respond to inquiry re: PPH FOIA fee request (.2)
10/9/2019	T. Carter. White	2.70	1.50		1.20		\$ 1,552.50	Search for IME fee schedule (.3); research types of abortions (.4); continue drafting undisputed SJ facts addressing 19 patients (1.5); review and analyze IME billing guidelines (.5).
10/9/2019	Stephanie Peatman	6.00					\$ 1,980.00	Researched (2.3) and drafted law and argument section regarding "no knowingly false claim" (3.7).
10/10/2019	T. Carter. White	1.20	1.20				\$ 690.00	Work on creation of SJ appendix.
10/11/2019	Kristen C. Rodriguez	0.50		0.50			\$ 377.50	Attention to FCA attorneys' fees analysis.
10/11/2019	T. Carter. White	2.80	2.80				\$ 1,610.00	Revise undisputed SJ facts addressing 19 patients.
10/11/2019	Charles C. Hayes	2.00					\$ 760.00	Research attorneys' fees issue for prevailing defendants in False Claims Act cases (1.4), draft memorandum (.6).
10/12/2019	Charles C. Hayes	6.20					\$ 2,356.00	Research the availability of attorneys' fees to prevailing defendants in False Claims Act actions (4.4), draft memorandum and submit to Kristen Rodriguez (1.8).
10/12/2019	Kristen C. Rodriguez	0.40		0.40			\$ 302.00	Review of FCA attorneys' fees analysis.
10/13/2019	Kristen C. Rodriguez	0.30	0.30				\$ 226.50	Review of Summary Judgement draft inserts.
10/13/2019	Charles C. Hayes	1.70					\$ 646.00	Research attorneys' fees timing issue (1.6), respond to Kristen Rodriguez (0.1).
10/14/2019	Charles C. Hayes	5.20					\$ 1,976.00	Draft legal standard for Motion for Summary Judgment in Thayer matter.
10/14/2019	T. Carter. White	0.50	0.50				\$ 287.50	Revise undisputed SJ facts (.3); work on redacting documents for SJ appendix (.2).
10/15/2019	Charles C. Hayes	0.40					\$ 152.00	Research attorneys' fees awards in False Claims Act cases.

Date	Name / Invoice Number	Hours	Plds, Mtn, Brief	Research	Investigation	Interviewing	Amount	Description
10/16/2019	Erika L. Amatore	4.00					\$ 1,480.00	Review patient information (.9); work on MSJ (3.1)
10/16/2019	Charles C. Hayes	7.20					\$ 2,736.00	Draft memorandum as to attorneys' fees deadline, availability of fees for previous proceedings, and assessing necessity of attorney appearances in future proceedings.
10/17/2019	Erika L. Amatore	5.20					\$ 1,924.00	Review patient records (1.7); work on memorandum (3.5)
10/17/2019	Stephanie Peatman	0.30					\$ 99.00	Reviewed updated statement of undisputed facts, prepared by C. White.
10/17/2019	Charles C. Hayes	5.00					\$ 1,900.00	Review and revise motion for summary judgment legal standard and miscellaneous arguments section.
10/17/2019	T. Carter. White	3.50	3.50				\$ 2,012.50	Reorganize patient in statement of undisputed facts thematically based on review and analysis of same (2.3); revise facts to add good testimony from W. Knau (1.2).
10/18/2019	Erika L. Amatore	1.50					\$ 555.00	Research case law on materiality
10/21/2019	Erika L. Amatore	3.60					\$ 1,332.00	Research case law on False Claims Act (1.5); work on knowledge of falsity argument (2.1)
10/22/2019	Charles C. Hayes	0.30					\$ 114.00	Revise motion for summary judgment legal standard.
10/22/2019	T. Carter. White	1.60	1.60				\$ 920.00	Confirm drafted facts are accurate based on review and analysis of expert reports.
10/23/2019	T. Carter. White	3.10	3.10				\$ 1,782.50	Draft facts insert for brief based on draft of undisputed facts (2); revise patient summary chart based on review of medical records (.6); edit undisputed patient facts (.5).
10/24/2019	T. Carter. White	1.10	1.10				\$ 632.50	Revise facts insert for brief based on draft of undisputed facts (.5); catalog open issues with facts for discussion with team (.2); confirm drafted facts are accurate based on review and analysis of expert reports (.4).
10/25/2019	Erika L. Amatore	6.00					\$ 2,220.00	Analyze case law (.6); draft sections VI, VII of MSJ (5.4).
10/25/2019	Kristen C. Rodriguez	0.50	0.50				\$ 377.50	Work on summary judgment briefing.
10/25/2019	T. Carter. White	0.20	0.20				\$ 115.00	Conference with K. Rodriguez regarding open issues with facts.
10/26/2019	T. Carter. White	0.40	0.40				\$ 230.00	Email K. Rodriguez re: current status of SJ briefing and open issues.
10/27/2019	Erika L. Amatore	3.70					\$ 1,369.00	Draft, revise sections of MSJ (3.5); draft email to Kristen Rodriguez regarding same (.2).
10/28/2019	Kristen C. Rodriguez	0.30	0.30				\$ 226.50	Work on summary judgment brief.
11/4/2019	T. Carter. White	0.50	0.10	0.40			\$ 287.50	Analyze SJ briefing status and plan (.1); research regulations governing global period (.4).
11/5/2019	T. Carter. White	1.10		1.10			\$ 632.50	Research regulations governing global period.
11/6/2019	Talia C. Linneman	1.60					\$ 640.00	Research global surgical codes in Medicare per request from C. White.
11/7/2019	T. Carter. White	1.70	0.50	1.20			\$ 977.50	Review and analyze research on abortions global period (.2); follow up research on same (1); revise facts to reflect same (.5).
11/8/2019	Talia C. Linneman	0.60					\$ 240.00	Research global surgical codes for abortion procedures.
11/11/2019	T. Carter. White	0.40	0.10	0.30			\$ 230.00	Analyze research on global period (.3); emails with K. Rodriguez re: SJ briefing (.1).
11/12/2019	T. Carter. White	0.20		0.20			\$ 115.00	Review and analyze supplemental research on abortions global period; (.1) emails with T. Linneman re: same (.1).
11/12/2019	Talia C. Linneman	1.30					\$ 520.00	Research global surgical codes in Medicare per request from C. White.
11/13/2019	T. Carter. White	0.30		0.30			\$ 172.50	Review and analyze supplemental research on abortion global periods (.1); follow up research on same (.2).
11/14/2019	T. Carter. White	1.10	1.10				\$ 632.50	Analyze strategy for abortion global periods in brief based on review of facts and research on same (.9); emails to team regarding follow up (.2).
11/14/2019	Talia C. Linneman	0.30					\$ 120.00	Research global surgical codes in Medicare per request from C. White.
11/18/2019	T. Carter. White	0.10	0.10				\$ 57.50	Check in with K. Rodriguez regarding SJ briefing.
11/19/2019	Kristen C. Rodriguez	2.50	2.50				\$ 1,887.50	Work on Phase 2 summary judgment statement of facts.
11/19/2019	T. Carter. White	0.10	0.10				\$ 57.50	Email S. Smith and K. Rodriguez regarding appendix.
11/20/2019	Suzanne D. Smith	2.90					\$ 986.00	Review statement of facts and oull additional documents to be used as potential exhibits.
11/20/2019	T. Carter. White	2.60	2.60				\$ 1,495.00	Work with S. Smith on assembling appendix (.4); revise undisputed facts to address comments from K. Rodriguez based on review and analysis of depositions and patient records (2.2).

Date	Name / Invoice Number	Hours	Plds, Mtn, Brief	Research	Investigation	Interviewing	Amount	Description
11/21/2019	Suzanne D. Smith	4.60					\$ 1,564.00	Review statemetrn of facts and excerpt patient files for same.
11/21/2019	Erika L. Amatore	1.50					\$ 555.00	Draft update to MSJ section
11/21/2019	T. Carter. White	5.90	5.20			0.70	\$ 3,392.50	Revise undisputed facts to address comments from K. Rodriguez based on review and analysis of depositions (.3.9); work with S. Smith on excerpting documents for appendix (.7); draft brief factual insert addressing coding and the global period (.6); prepare for and call with L. Singer regarding outstanding issues (.7).
11/21/2019	Tony K. Lu	0.20	0.20				\$ 99.00	Attention to fee schedule inquiry from Carter White.
11/22/2019	Jae K. Park	0.50			0.40		\$ 302.50	Investigate instances of billing for prescription birthcontrol (.4); communicate with C. White regarding same (.1).
11/22/2019	Suzanne D. Smith	2.70					\$ 918.00	Review of updated statement of factsand pull additional documents to be used as potential exhibits.
11/22/2019	T. Carter. White	1.50	1.50				\$ 862.50	Revise undisputed facts to address comments from K. Rodriguez based on review and analysis of depositions (1.1); work with S. Smith on assembling documents for appendix (.2); review and analyze abortion procedure descriptions in medical records (.2).
11/23/2019	Talia C. Linneman	0.90					\$ 360.00	Email with Dentons attorneys S. Banks and C. White regarding Medicare coverage of health care service code.
11/23/2019	Susan J. Banks	0.20					\$ 136.00	Consult with T. Linneman regarding Medicare reimbursement for medication abortions.
11/23/2019	Erika L. Amatore	1.20					\$ 444.00	Revise portion of MSJ (1.1); email to Kristen Rodriguez regarding same (.1)
11/25/2019	Kristen C. Rodriguez	2.50	2.50				\$ 1,887.50	Draft and revise motion for summary judgment.
11/25/2019	Suzanne D. Smith	2.60					\$ 884.00	Revie SJ brief and pull cited deposition pages and additional patient records to create appendix.
11/25/2019	T. Carter. White	1.30	0.80			0.50	\$ 747.50	Call K. Rodriguez regarding edits to facts (.3); prepare for and call L. Singer regarding various arguments for SJ (.5); analyze ability to use phone calls to support reasonable interpretation defense (.5).
11/26/2019	Suzanne D. Smith	4.30					\$ 1,462.00	Review revised version of brief and update appendix with additional records and depositions pages
11/26/2019	T. Carter. White	2.00	2.00				\$ 1,150.00	Revise SJ facts to address comments from K. Rodriguez.
11/26/2019	Kristen C. Rodriguez	1.20	1.20				\$ 906.00	Work on summary judgment brief.
11/27/2019	Jae K. Park	1.20	1.20				\$ 726.00	Work on procedural posture and legal standard portions of motion for summary judgment on Thayer's claim.
11/27/2019	Suzanne D. Smith	1.50					\$ 510.00	Update appendix to include various pleadings/orders
11/28/2019	Erika L. Amatore	0.10					\$ 37.00	Emails from Kristen Rodriguez regarding case law needed for insert.
11/28/2019	Kristen C. Rodriguez	2.80	2.80				\$ 2,114.00	Draft and revise summary judgment brief and statement of facts.
11/29/2019	Kristen C. Rodriguez	5.20	4.10				\$ 3,926.00	Draft and revise summary judgment brief and statement of facts.
11/29/2019	Erika L. Amatore	7.00					\$ 2,590.00	Research case law regarding undercoding and scienr, and regarding expert's testimony supporting materiality
11/30/2019	Suzanne D. Smith	0.80					\$ 272.00	Review file to obtain additional medical records for appendix
11/30/2019	Kristen C. Rodriguez	3.10	3.10				\$ 2,340.50	Draft and revise summary judgment brief and statement of facts.
11/30/2019	Jae K. Park	2.20	1.40	0.80			\$ 1,331.00	Further revise and supplement section of motion for summary judgment (1.4); perform legal research regarding standards for summary judgment (.8).
12/1/2019	Kristen C. Rodriguez	8.60	8.60				\$ 6,493.00	Draft and revise summary judgment brief and statement of facts.
12/1/2019	Charles C. Hayes	1.20					\$ 456.00	Revise motion for summary judgment.
12/1/2019	T. Carter. White	2.80	2.80				\$ 1,610.00	Research federal register cite for the abortion global period (1.2); create plan for assembly of appendix (.5); coordinate creation of motion to seal (1.1).
12/1/2019	Erika L. Amatore	2.00					\$ 740.00	Research case law on whether materiality under FCA may be supported by expert's testimony
12/1/2019	Suzanne D. Smith	0.50					\$ 170.00	Review previously filed SJ Motion in order to obtain format for TOC (.2); add additional deposition pages to appendix (.3).

Date	Name / Invoice Number	Hours	Plds, Mtn, Brief	Research	Investigation	Interviewing	Amount	Description
12/2/2019	Erika L. Amatore	0.50					\$ 185.00	Draft email to Kristen Rodriguez regarding update to research (.1); research case law on materiality question (.4)
12/2/2019	Clayton E. Faits	1.10					\$ 429.00	Draft motion for leave to file under seal: MSJ and supporting docs for Phase II.
12/2/2019	T. Carter. White	3.50	2.30	1.20			\$ 2,012.50	Draft Appendix TOC based on review and analysis of facts and prior versions (1.3); manage research for federal register global period cite (1.2); manage compilation of appendix documents (1).
12/2/2019	Charles C. Hayes	1.30					\$ 494.00	Revise motion for summary judgment.
12/2/2019	Tony K. Lu	0.20	0.20				\$ 99.00	Attention to and respond to C. White inquiry related to Jennifer Warren Ulrich declaration for summary judgment.
12/2/2019	Eugene M. Giudice	1.00					\$ 295.00	Obtain cases that support the premise that information omitted from subsequent amended complaints is not at issue for C. Faits
12/2/2019	Mary K. Ciziunas	0.50					\$ 155.00	Conduct research to locate 2007 Physician Fee Schedule CPT codes per C. White.
12/2/2019	Mary K. Ciziunas	0.20					\$ 62.00	Obtain Federal Register cites per C. White.
12/2/2019	Suzanne D. Smith	1.20					\$ 408.00	Review draft statement of facts and update appendix
12/2/2019	Kamie Oehrle	2.00					\$ 620.00	Research Federal Register to locate global periods for various surgical procedures from 2006 to 2008. Request made by Kristen Rodriguez.
12/2/2019	Clayton E. Faits	1.40					\$ 546.00	Spot research for MSJ brief.
12/2/2019	Clayton E. Faits	0.80					\$ 312.00	Spot research for MSJ brief.
12/2/2019	Jae K. Park	0.50	0.50				\$ 302.50	Work on motion for summary judgment.
12/2/2019	Kristen C. Rodriguez	7.10	7.10				\$ 5,360.50	Draft and revise motion for summary judgment for Phase II.
12/3/2019	T. Carter. White	7.60	7.60				\$ 4,370.00	Review and comment on summary judgment brief (1.1); add citations to brief based on review of deposition transcripts and expert reports (5.2); revise motion to seal summary judgment papers (.6); manage research for federal register global period cite (.4); manage compilation and excerpts of appendix documents (.3).
12/3/2019	Alan S. Gilbert	3.50	3.50				\$ 3,955.00	Review and edit sj brief (3); conf. K. Rodriguez re: same (.5)
12/3/2019	Clayton E. Faits	0.90					\$ 351.00	Spot research for MSJ brief.
12/3/2019	Clayton E. Faits	1.30					\$ 507.00	Draft motion to file a brief under seal.
12/3/2019	Erika L. Amatore	2.40					\$ 888.00	Revise draft MSJ (2.0); research case law on materiality (.4).
12/3/2019	Jae K. Park	1.50	1.50				\$ 907.50	Further revise and supplement summary judgment brief (1.3); email exchange with K. Rodriguez regarding same (.2).
12/4/2019	Clayton E. Faits	8.20					\$ 3,198.00	Revise and cite-check (substantive & bluebook) brief in support of motion for summary judgment.
12/4/2019	T. Carter. White	13.10	13.10				\$ 7,532.50	Revise facts and appendix documents based on review and analysis of brief (4.8); conference with K. Rodriguez regarding brief, facts and appendix (.4); cite check facts and appendix based on detailed review and analysis of same (5.3); work with S. Smith and I. Ortiz on assembling and formatting documents for appendix (1.7); revise appendix TOC (.5); label documents for same (.4).
12/4/2019	Charles C. Hayes	2.50					\$ 950.00	Revise motion for summary judgment.
12/4/2019	Jae K. Park	1.00	1.00				\$ 605.00	Further revise, edit, and supplement motion for summary judgment (.6); consider and analyze strategy for addressing Thayer's declaration and purported facts asserted therein (.2); analyze Iowa Medicaid Enterprise regulations regarding abortion billing (.2).
12/4/2019	Alan S. Gilbert	1.50	1.50				\$ 1,695.00	Editing summary judgment brief
12/4/2019	Suzanne D. Smith	0.90					\$ 306.00	Assist with preparation of documents to be added to appendix
12/4/2019	Kristen C. Rodriguez	5.50	5.50				\$ 4,152.50	Various calls and correspondence regarding MSJ (.8); revise MSJ brief (4.7).
12/5/2019	Charles C. Hayes	2.10					\$ 798.00	Revise motion for summary judgment.

Date	Name / Invoice Number	Hours	Plds, Mtn, Brief	Research	Investigation	Interviewing	Amount	Description
12/5/2019	T. Carter. White	12.80	11.40	1.40			\$ 7,360.00	Cite check facts and appendix based on detailed review and analysis of same (3.7); work with S. Smith and I. Ortiz on formatting documents for appendix, assembling and labeling same, and cutting same to meet filing limits (2.8); emails with local counsel regarding same (.3); revise SJ cover motion (.4); revise facts based on comments from K. Rodriguez (2.5); revise motion for extra pages (.4); draft transmittal declaration authenticating appendix (1.3); research regarding lack of firsthand knowledge on summary judgment (1.4).
12/5/2019	Clayton E. Faits	0.40					\$ 156.00	Draft motion for leave to file an overlength brief.
12/5/2019	Clayton E. Faits	2.80					\$ 1,092.00	Add SF citations to brief ISO MSJ phase II.
12/5/2019	Erika L. Amatore	3.50					\$ 1,295.00	Research materiality in implied certification false claims act cases
12/5/2019	Kristen C. Rodriguez	3.90	3.90				\$ 2,944.50	Draft and revise Phase II MSJ filings.
12/5/2019	Alan S. Gilbert	0.30	0.30				\$ 339.00	Conf. K. Rodriguez re: issue in sj brief
12/5/2019	Suzanne D. Smith	3.80					\$ 1,292.00	Review patient files for use in appendix (1.5); Obtain additional deposition pages for use in appendix (2.3).
12/6/2019	Clayton E. Faits	9.50					\$ 3,705.00	Add citations, proofread, and prepare statement of facts and memo ISO MSJ in phase II.
12/6/2019	T. Carter. White	10.90	10.90				\$ 6,267.50	Finalize appendix (1.2); insert cites into various SJ documents, including statement of facts, authenticating declaration, and appendix TOC (6.9); revise patient summary chart and analyze whether to use as exhibit to brief (1.1); assist with finalizing and filing cover motion, motion for extra pages, and appendix documents (1.3); plan for sending courtesy copies to court (.4).
12/6/2019	Charles C. Hayes	2.40					\$ 912.00	Revise motion for summary judgment.
12/6/2019	Suzanne D. Smith	1.00					\$ 340.00	Assist with final preparation for appendix
12/6/2019	Jae K. Park	1.00	1.00				\$ 605.00	Review and analyze final brief in support of motion for summary judgment (.7); conference with K. Rodriguez regarding logistics and filing and service (.3).
12/6/2019	Kristen C. Rodriguez	4.10	4.10				\$ 3,095.50	Revise and finalize MSJ filings.
12/9/2019	Charles C. Hayes	2.40					\$ 912.00	Review Thayer motion for summary judgment.
12/9/2019	Jae K. Park	0.50	0.50				\$ 302.50	Review and analyze Thayer's motion for summary judgment.
12/9/2019	Kristen C. Rodriguez	0.50	0.50				\$ 377.50	Correspondence with court regarding certificate of service (.1); direct team on courtesy copies and delivery to client (.1); revise certificate of service (.3).
12/9/2019	Suzanne D. Smith	0.30					\$ 102.00	Update master file to include recently filed pleadings
12/9/2019	T. Carter. White	3.60	3.60				\$ 2,070.00	Review and analyze Plaintiff's Phase II SJ brief & statement of facts (3); coordinate record keeping for motions and creation of courtesy copies for Cour (.4); revise proof of service documents (.2).
12/10/2019	T. Carter. White	2.70	2.70				\$ 1,552.50	Review and analyze Plaintiff's Phase II statement of facts (.6); review and analyze our responses to Phase I statement of facts (.5); draft cover letter to judge for courtesy copies (.3); begin preparing to draft responses to statement of undisputed facts (1.3).
12/11/2019	Erika L. Amatore	2.50					\$ 925.00	Review PPH and Thayer MSJ filings
12/11/2019	T. Carter. White	1.40	1.40				\$ 805.00	Review and analyze Plaintiff's statement of undisputed facts (1.1); finalize and send courtesy copies of SJ motion to judge (.3).
12/11/2019	Clayton E. Faits	1.00					\$ 390.00	Read and analyze Plaintiff's MSJ in Phase II.
12/11/2019	Kristen C. Rodriguez	2.00	2.00				\$ 1,510.00	Review plaintiff's brief.
12/12/2019	Kristen C. Rodriguez	2.00	2.00				\$ 1,510.00	Work on strategy for response brief.
12/12/2019	Erika L. Amatore	2.00					\$ 740.00	Prepare for telephone conference call regarding opposition to Thayer motion for summary judgment (1.1); telephone conference call with Kristen Rodriguez, team regarding same (.9).
12/12/2019	Alan S. Gilbert	1.00	1.00				\$ 1,130.00	Review relator's sj motion and brief and email K. Rodriguez with comments for reply
12/12/2019	T. Carter. White	2.10	2.10				\$ 1,207.50	Review and analyze Plaintiff's brief and create strategy for response (1.2); team call regarding brief strategy (.9).
12/12/2019	Charles C. Hayes	0.90					\$ 342.00	Planned Parenthood-Thayer team call.
12/12/2019	Clayton E. Faits	1.30					\$ 507.00	PPH Team Call to discuss plaintiff's brief filed, 12/6/19; 1:00pm (CST)
12/12/2019	Suzanne D. Smith	1.30					\$ 442.00	Participate in SJ team call (.9); pull documents relating to coding (.3).
12/12/2019	Stephanie Peatman	1.00					\$ 330.00	Reply brief strategy call.
12/13/2019	Jae K. Park	0.50	0.50				\$ 302.50	Draft memorandum to team regarding deficiencies in Thayer's motion for summary judgment.

Date	Name / Invoice Number	Hours	Plds, Mtn, Brief	Research	Investigation	Interviewing	Amount	Description
12/13/2019	Kristen C. Rodriguez	1.50	1.50				\$ 1,132.50	Prepare for and attend call with client.
12/13/2019	Clayton E. Faits	8.00					\$ 3,120.00	Draft outline of our reply to Plaintiff's Phase II MSJ.
12/13/2019	T. Carter. White	1.30	1.30				\$ 747.50	Analyze and create strategy for addressing responses to statement of facts.
12/16/2019	Kristen C. Rodriguez	0.90	0.90				\$ 679.50	Work on response brief and statement of facts.
12/16/2019	Erika L. Amatore	3.80					\$ 1,406.00	Work on responses to statement of facts
12/16/2019	Tony K. Lu	0.90			0.90		\$ 445.50	Attention to inquiry related to medical protocols.
12/16/2019	T. Carter. White	5.10	4.80	0.30			\$ 2,932.50	Review, analyze, and revise outline of SJ opposition brief (.2); analyze strategy for response to SJ facts (.4); begin drafting responses to Plaintiff's statement of facts (2.4); research responses to same (.3).
12/17/2019	T. Carter. White	0.80	0.80				\$ 460.00	Review and analyze abortion protocol (.3); assist with preparation of facts response and SJ brief outline (.5).
12/17/2019	Erika L. Amatore	4.50					\$ 1,665.00	Emails to/from Carter White re missing documents (.3); work on responses to statement of facts (4.2).
12/17/2019	Kristen C. Rodriguez	0.70	0.70				\$ 528.50	Revise outline for Phase 2 SJ response.
12/17/2019	Kristen C. Rodriguez	1.00	1.00				\$ 755.00	Work on strategy for response brief.
12/17/2019	Suzanne D. Smith	1.30					\$ 442.00	Review files for possible exhibits for use in Response
12/17/2019	Clayton E. Faits	0.90					\$ 351.00	Call to Kristen Rodriguez re: Phase II MSJ response outline feedback.
12/17/2019	Clayton E. Faits	3.80					\$ 1,482.00	Revise Phase II MSJ response outline.
12/18/2019	Erika L. Amatore	2.00					\$ 740.00	Draft responses to statement of facts (1.7); emails to Carter White, Kristen Rodriguez regarding same (.3).
12/18/2019	Kristen C. Rodriguez	0.50	0.50				\$ 377.50	Edit statement of facts
12/18/2019	T. Carter. White	2.00	1.50			0.50	\$ 1,150.00	Review and comment on approach to undisputed facts response (.4); revise model undisputed facts response (1.6); call L. Singer regarding V67.00 code (.5).
12/19/2019	Erika L. Amatore	5.70					\$ 2,109.00	Draft responses to statement of facts (5.5); emails to/from Carter White regarding same (.2).
12/19/2019	T. Carter. White	5.90	5.30				\$ 3,392.50	Continue drafting responses to Plaintiff's undisputed facts based on review of SJ and discovery documents (5.1); analyze appendix, issues with same, and potential corrective filing (.6); emails with E. Amatore regarding facts and brief (.2).
12/21/2019	Suzanne D. Smith	1.40					\$ 476.00	Review file to obtain potential exhibits for Response filing
12/22/2019	Kristen C. Rodriguez	0.50	0.50				\$ 377.50	Revise reply brief outline.
12/23/2019	Kristen C. Rodriguez	1.50	1.50				\$ 1,132.50	Work on summary judgment response brief.
12/23/2019	Erika L. Amatore	0.50					\$ 185.00	Call from Stephanie Peatman regarding statement of facts, case files (.3); emails to/from Stephanie Peatman re same (.2)
12/23/2019	T. Carter. White	5.70	5.70				\$ 3,277.50	Continue drafting responses to Plaintiff's 'undisputed' facts based on review of SJ and discovery documents (4.7); review and analyze outline of SJ motion (.4); analyze strategy for addressing protocol (.3); call and email K. Rodriguez & S. Peatman regarding issues with SJ briefing (.3).
12/23/2019	Suzanne D. Smith	1.40					\$ 476.00	Review database and master file to obtain documents for use in response
12/24/2019	Kristen C. Rodriguez	0.30			0.30		\$ 226.50	Correspondence with client and analysis regarding same.
12/24/2019	Stephanie Peatman	4.00					\$ 1,320.00	Reviewed master patient list and declarations of expert witnesses in preparation for drafting objections to Relator's separate statement of undisputed facts.
12/24/2019	Stephanie Peatman	4.40					\$ 1,452.00	Drafted objections to Relator's separate statement of undisputed facts.
12/26/2019	Kristen C. Rodriguez	0.40	0.40				\$ 302.00	Work on summary judgment statement of facts.
12/26/2019	Suzanne D. Smith	0.80					\$ 272.00	Review master file to obtain documents for use in response
12/26/2019	T. Carter. White	0.50					\$ 287.50	Coordinate search for abortion protocol and preparation of replacement appendix.
12/26/2019	Tony K. Lu	0.50			0.50		\$ 247.50	Attention to PPH inquiry related to medical protocols.
12/27/2019	Erika L. Amatore	4.00					\$ 1,480.00	Draft insert re materiality for opposition to Phase II MSJ
12/29/2019	T. Carter. White	4.60	4.60				\$ 2,645.00	Continue drafting responses to undisputed facts (3.1); craft responses to undisputed facts based on review and analysis of prior facts (.8); review and analyze documents related to abortion protocols (.7).

Date	Name / Invoice Number	Hours	Plds, Mtn, Brief	Research	Investigation	Interviewing	Amount	Description
12/30/2019	Jae K. Park	2.40	2.40				\$ 1,452.00	Review and analyze Relator's and Planned Parenthood of the Heartland's motions for summary judgment and related filings.
12/30/2019	Clayton E. Faits	0.40					\$ 156.00	Composed email to T. Carter White regarding knowledge/intent standard for SJ reply brief.
12/30/2019	Clayton E. Faits	1.70					\$ 663.00	Draft MSJ reply brief.
12/30/2019	T. Carter. White	7.60	4.30	3.30			\$ 4,370.00	Begin drafting opposition brief to Plaintiff's MSJ (2.5); analyze strategy for same based on review of Plaintiff's brief (1.4); research into cases granting SJ on FCA claims because of a lack of evidence of knowledge (1.2); research cases supporting view that plaintiff is seeking a redundant construction of the statute (2.1); emails with S. Smith regarding AB protocol (.2); emails with C. Faits regarding strategy for opposition argument (.2).
12/30/2019	Suzanne D. Smith	0.60					\$ 204.00	Review master file to obtain documents to be used in response
12/30/2019	Tony K. Lu	0.30			0.30		\$ 148.50	Attention to further inquiries from C. White re: legacy issues related to PPH.
12/31/2019	T. Carter. White	7.80	7.80				\$ 4,485.00	Continue drafting opposition brief to Plaintiff's MSJ (4.9); review and analyze cases cited in Plaintiff's brief (1.7); review and analyze plaintiff's brief to confirm accurate characterization of argument (.6); review and analyze favorable knowledge cases (.6).
12/31/2019	Clayton E. Faits	8.20					\$ 3,198.00	Draft MSJ reply brief.
12/31/2019	Erika L. Amatore	3.00					\$ 1,110.00	Draft insert on materiality for opposition to Phase II MSJ
12/31/2019	Suzanne D. Smith	5.40					\$ 1,836.00	Analyze Abortion Spreadsheet to determine self pay patients
1/1/2020	T. Carter. White	2.80	2.80				\$ 1,806.00	Continue drafting opposition brief to Plaintiff's MSJ.
1/2/2020	Erika L. Amatore	0.10					\$ 39.00	Composed email to Clayton Faits, Suzanne Smith, Kristen Rodriguez, Stephanie Peatman re PPH response to SOF, ELA revisions.
1/2/2020	Jae K. Park	5.30	5.30				\$ 3,551.00	Work on response to Thayer's separate statement of undisputed facts in support of motion for summary judgment.
1/2/2020	Suzanne D. Smith	3.90					\$ 1,384.50	Review Abortion Spreadsheet to determine if follow-up visits were paid by patient and create spreadsheet of findings
1/2/2020	Clayton E. Faits	7.30					\$ 2,847.00	Draft responses to Plaintiff's SoF (5.5); draft sections of responsive memo to Plaintiff's MSJ (1.8).
1/2/2020	T. Carter. White	7.70	7.70				\$ 4,966.50	Continue drafting opposition brief to Plaintiff's MSJ (3.5); review and revise same (2.7); supplemental research regarding lack of foundation for Relator's testimony (1.2); calls with S. Smith and C. Faits regarding briefing (.3).
1/3/2020	Clayton E. Faits	9.00					\$ 3,510.00	Draft responses to Plaintiff's SoF (5.6); draft sections of responsive memo to Plaintiff's MSJ (3.4).
1/3/2020	Suzanne D. Smith	1.10					\$ 390.50	Organize collection of responses to statement of facts and merge into one document.
1/3/2020	Erika L. Amatore	0.10					\$ 39.00	Emails from Suzanne Smith regarding responses to statement of facts
1/3/2020	T. Carter. White	6.50	6.50				\$ 4,192.50	Review and revise opposition brief to Plaintiff's MSJ (2.4); supplemental research regarding knowledge element of FCA claim (2.1); review S. Smith's analysis of billing records and incorporate into facts and brief (2).
1/4/2020	Clayton E. Faits	3.50					\$ 1,365.00	Draft responsive memo to Plaintiff's MSJ.
1/5/2020	Clayton E. Faits	5.00					\$ 1,950.00	Draft responsive memo to Plaintiff's MSJ.
1/5/2020	Suzanne D. Smith	0.80					\$ 284.00	Prepare client billing spreadsheet for use in upcoming response appendix
1/6/2020	Kristen C. Rodriguez	0.50	0.50				\$ 397.50	Work on response to plaintiff's partial MSJ motion.
1/6/2020	Clayton E. Faits	1.50					\$ 585.00	Draft opposition memorandum to Plaintiff's MSJ
1/6/2020	T. Carter. White	4.10	0.30	1.20	2.10		\$ 2,644.50	Review and analyze ICD-9 guidelines sent by L. Singer (1.3); draft summary of same (.6); email L. Singer regarding follow up call (.2); research local rules regarding corrective ecf filing (.3); email local counsel regarding same (.2); emails with K. Rodriguez regarding open SJ issues and follow up emails regarding same (.3); research favorable SJ FCA cases addressing knowledge requirement (1.2).
1/6/2020	Suzanne D. Smith	0.80					\$ 284.00	Revise exhibit to include additional patient information

Date	Name / Invoice Number	Hours	Plds, Mtn, Brief	Research	Investigation	Interviewing	Amount	Description
1/7/2020	T. Carter. White	2.40		1.10	0.40	0.70	\$ 1,548.00	Research favorable SJ FCA cases addressing knowledge requirement (1.1); call with clerk's office regarding corrections to appendix (.2); prepare for and call L. Singer regarding V67 code (.7); review and analyze ICD-9 guidelines (.4).
1/8/2020	Kristen C. Rodriguez	0.30	0.30				\$ 238.50	Work on response to plaintiff's motion for summary judgment.
1/8/2020	T. Carter. White	1.80		1.50			\$ 1,161.00	Research favorable SJ FCA cases and secondary sources addressing knowledge requirement (1.5); work on updating appendix (.3).
1/9/2020	T. Carter. White	5.50	2.00	1.70			\$ 3,547.50	Draft summary of favorable SJ FCA cases addressing knowledge and falsity elements (1.7); review and analyze revised appendix and prepare for filing it (1.8); review and analyze physical exams medical protocol and implications for summary judgment (1.2); review and analyze Plaintiff's discovery requests (.8).
1/9/2020	Tony K. Lu	0.40	0.40				\$ 228.00	Attention to and correspond with Carter White re: plaintiff's production.
1/9/2020	Suzanne D. Smith	2.60					\$ 923.00	Search master file and archive emails to obtain materials for C. White's review
1/10/2020	Kristen C. Rodriguez	2.50	2.50				\$ 1,987.50	Work on response to summary judgment brief.
1/10/2020	Clayton E. Faits	5.50					\$ 2,145.00	Draft separate statement of additional facts for MSJ resistance brief (3.3); research materiality argument (2.2).
1/10/2020	Suzanne D. Smith	0.60					\$ 213.00	Work with attorneys in obtaining responses to create master document
1/10/2020	T. Carter. White	2.70	2.10				\$ 1,741.50	Review and analyze responses to Plaintiff's discovery requests (.4); review and analyze Plaintiff's document production for protocols (.7); draft summary of analysis of protocol issue (1); arrange for filing of revised appendix and send to Plaintiff's counsel (.6).
1/11/2020	Kristen C. Rodriguez	1.50	1.50				\$ 1,192.50	Work on response to summary judgment brief.
1/12/2020	Kristen C. Rodriguez	7.60	7.60				\$ 6,042.00	Draft and revise response to Relator's summary judgment brief.
1/12/2020	Suzanne D. Smith	0.50					\$ 177.50	Revise billing spreadsheet for use an exhibit in Supplement Appendix
1/13/2020	Kristen C. Rodriguez	4.00	4.00				\$ 3,180.00	Work on brief.
1/13/2020	Suzanne D. Smith	2.10					\$ 745.50	Review SUF and pull additional documents cited to be used in Supplemental Appendix
1/13/2020	Clayton E. Faits	7.30					\$ 2,847.00	Draft supplemental statement of additional facts.
1/13/2020	T. Carter. White	3.50	3.20				\$ 2,257.50	Coordinate creating of courtesy copies of revised appendix (.3); assist with creating supplemental appendix exhibit for additional patient files (.2); investigate and remedy filing issue with amended appendix (.2); draft brief insert regarding disputing falsity element (1).
1/14/2020	Kristen C. Rodriguez	2.50	2.50				\$ 1,987.50	Revise brief and fact statements.
1/14/2020	T. Carter. White	3.30	3.10				\$ 2,128.50	Revise brief insert and draft facts regarding dispute over falsity element (.9); research scope of sampled billing records (.5); draft brief and fact inserts to address billing records and lack of self-pay patients (1.7); communications with court regarding appendix filing (.2).
1/14/2020	Clayton E. Faits	4.50					\$ 1,755.00	Revise resistance memorandum (3.3); update separate statement of additional facts (1.2).
1/14/2020	Suzanne D. Smith	1.10					\$ 390.50	Revise deposition excerpts for use in Appendix
1/15/2020	Erika L. Amatore	7.70					\$ 3,003.00	Telephone calls with Carter White, Suzy Smith regarding revisions to statement of facts (.4); review and revise statement of facts (5.8); draft supplemental exhibit (1.5).
1/15/2020	Kristen C. Rodriguez	3.00	3.00				\$ 2,385.00	Work on response brief and facts.
1/15/2020	T. Carter. White	6.00	5.20				\$ 3,870.00	Revise and condense brief based on review and analysis of appendices, facts, and initial briefs (4.8); emails with K. Rodriguez and C. Faits regarding brief revisions (.4); coordinate preparation of courtesy copies of amended appendix (.4); draft letter to court regarding same (.4).
1/15/2020	Suzanne D. Smith	0.50					\$ 177.50	Revise draft SUF
1/15/2020	Clayton E. Faits	5.30					\$ 2,067.00	Revise separate statement of additional facts (2.3), draft authentication declaration (1.4), revise memorandum in resistance to plaintiff's MSJ (1.6).

Time Entry Records in
United States ex rel. Thayer v. Planned Parenthood of the Heartland

Date	Name / Invoice Number	Hours	Plds, Mtn, Brief	Research	Investigation	Interviewing	Amount	Description
1/16/2020	T. Carter. White	3.60	3.30				\$ 2,322.00	Assist with finalizing supplemental appendix (.4); finalize and send courtesy copies of amended appendix to court (.3); conference with K. Rodriguez regarding outstanding briefing issues (.3); update billing spreadsheet excerpt for appendix (.8); revise facts to resolve open protocol issues (.5); draft insert for brief regarding v67 code (1.3).
1/16/2020	Kristen C. Rodriguez	8.10	8.10				\$ 6,439.50	Edited resistance and facts.
1/16/2020	Erika L. Amatore	2.00					\$ 780.00	Revise statement of facts (1.8); emails to Suzy Smith, Kristen Rodriguez regarding same (.2).
1/16/2020	Clayton E. Faits	8.30					\$ 3,237.00	Revise separate statement of additional facts (1.2); draft and file motion to seal (2.4); revise memorandum in resistance to plaintiff's MSJ including cite-checking (4.7).
1/16/2020	Suzanne D. Smith	3.80					\$ 1,349.00	Assist with revisions to SUF
1/17/2020	Erika L. Amatore	2.00					\$ 780.00	Final review of statement of facts and brief (1.9); draft emails to Kristen Rodriguez regarding same (.1).
1/17/2020	Stephanie Peatman	1.30					\$ 481.00	Proof read Planned Parenthood opposition brief and statement of facts section prior to filing.
1/17/2020	Kristen C. Rodriguez	3.80	3.80				\$ 3,021.00	Revise SUF and brief, and finalize.
1/17/2020	Jae K. Park	0.80	0.80				\$ 536.00	Review and analyze opposition to Thayer's motion for summary judgment (.4); edit and supplement same (.2); review and edit response to Thayer's separate statement of undisputed material facts (.2).
1/17/2020	Suzanne D. Smith	3.10					\$ 1,100.50	Assist with filing of SUF
1/17/2020	Clayton E. Faits	7.00					\$ 2,730.00	Finalize resistance to Plaintiff's MSJ (.3); finalize separate statement of additional facts (.4); finalize authenticating declaration (.8); cite-check memorandum and SUF (5.5).
1/17/2020	T. Carter. White	8.80	8.20	0.60			\$ 5,676.00	Revise brief to incorporate final comments, citations, and edits (3); proofread same (3.6); supplemental research for brief (.6); coordinate finalizing, filing, and serving summary judgment opposition papers (1.6).
1/20/2020	Suzanne D. Smith	0.20					\$ 71.00	Review filings and update shared drive with filed copies
1/20/2020	T. Carter. White	3.10	3.10				\$ 1,999.50	Review Plaintiff's SJ resistance brief and analyze strategy for responding to same.
1/21/2020	T. Carter. White	6.70	6.70				\$ 4,321.50	Review and analyze Plaintiff's SJ resistance brief and outline reply (3.4); review and analyze Plaintiff's additional facts and responses to PPH facts (2); coordinate response effort and assign roles (.8); coordinate provision of Resistance courtesy copies to court (.5).
1/22/2020	T. Carter. White	7.40	7.40				\$ 4,773.00	Draft reply brief in support of MSJ (6.9); emails to client (.2); coordinate response to Plaintiff's facts (.3).
1/23/2020	Stephanie Peatman	3.80					\$ 1,406.00	Reviewed plaintiff's additional facts in support of reliance to Planned Parenthood's motion for summary judgment on Count II.
1/23/2020	Stephanie Peatman	2.10					\$ 777.00	Reviewed patient medical records, master spreadsheet and expert reports in preparation for drafting opposition to plaintiff's additional facts in support of reliance to Planned Parenthood's motion for summary judgment on Count II.
1/23/2020	Stephanie Peatman	1.20					\$ 444.00	Began drafting opposition to plaintiff's new facts alleged in Count II of motion for summary judgment.
1/23/2020	T. Carter. White	7.60	2.80	4.80			\$ 4,902.00	Revise reply brief; draft preliminary statement for same (1.8); conduct research on various topics to include in same, including cases granting SJ for lack of evidence on knowledge and materiality elements, cases excluding late disclosed evidence, and cases discussing law of the case (4.8); revise template for fact responses (.5); edit citation format based on review of underlying documents (.5).
1/24/2020	Stephanie Peatman	5.20					\$ 1,924.00	Drafted objections and responses to plaintiff's additional facts in support of resistance to planned parenthood's motion for summary judgment on Count II.
1/24/2020	Clayton E. Faits	3.10					\$ 1,209.00	Draft responses to Relator's supplemental statement of facts attached to her resistance to PPH's MSJ.
1/24/2020	T. Carter. White	5.40	4.70	0.70			\$ 3,483.00	Conference with K. Rodriguez and A. Gilbert regarding reply brief (1); revise reply brief to cut length and address comments from team (3.2); supplemental research for same (.7); coordinate preparation of fact responses (.5).

Time Entry Records in
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Date	Name / Invoice Number	Hours	Plds, Mtn, Brief	Research	Investigation	Interviewing	Amount	Description
1/24/2020	Kristen C. Rodriguez	1.00	1.00				\$ 795.00	Prepare for and attend call with C. White and A. Gilbert regarding reply brief strategy.
1/26/2020	Suzanne D. Smith	1.90					\$ 674.50	Review portions of response in preparation for filing
1/27/2020	Clayton E. Faits	0.10					\$ 39.00	Edit Response to Relator's Resistance Facts
1/27/2020	T. Carter. White	0.80	0.80				\$ 516.00	Revise reply brief.
1/28/2020	Clayton E. Faits	0.80					\$ 312.00	Revise responses to Relator's supplemental statement of facts.
1/28/2020	T. Carter. White	5.00	5.00				\$ 3,225.00	Revise and circulate fact responses based on review and analysis of appendices (2.8); revise reply brief to cut pages based on comments from K. Rodriguez (2.2).
1/28/2020	Kristen C. Rodriguez	0.50	0.50				\$ 397.50	Work on reply brief in support of summary judgment.
1/29/2020	T. Carter. White	1.80	1.80				\$ 1,161.00	Email opposing counsel regarding page length (.2); draft motions to seal and for extra pages (1.2); analyze status of reply effort (.4).
1/29/2020	Clayton E. Faits	0.70					\$ 273.00	Revise and finalize document subpoenas for Wexford, IDOC, and U of I eye clinic.
1/29/2020	Stephanie Peatman	1.90					\$ 703.00	Revised objections to Relator's resistance facts per C. White.
1/29/2020	Kristen C. Rodriguez	4.00	4.00				\$ 3,180.00	Work on reply brief and statement of facts.
1/30/2020	T. Carter. White	9.20	9.20				\$ 5,934.00	Revise reply brief based on comments from K. Rodriguez (3.9); conference with K. Rodriguez regarding same (.8); circulate brief to team for comment (.2); revise fact responses based on review and analysis of briefs and appendices (4.3).
1/30/2020	Kristen C. Rodriguez	1.50	1.50				\$ 1,192.50	Work on summary judgment reply brief.
1/31/2020	Clayton E. Faits	3.70					\$ 1,443.00	Cite check reply brief to Relator's response to PPH's motion for summary judgment in phase II.
1/31/2020	Suzanne D. Smith	0.60					\$ 213.00	Review filings to update master file
1/31/2020	T. Carter. White	7.90	7.90				\$ 5,095.50	Proofread and revise reply brief and response to facts (3.8); coordinate cite check and tables for same (.4); conference with K. Rodriguez regarding reply (.3); finalize brief and facts and manage filing and service of same (3.4).
1/31/2020	Kristen C. Rodriguez	1.00	1.00				\$ 795.00	Review revised versions of brief and SUF response for reply.
2/3/2020	T. Carter. White	2.30	2.30				\$ 1,483.50	Review and analyze reply brief, need for sur-reply, and next steps.
4/26/2020	Kristen C. Rodriguez	0.30	0.30				\$ 238.50	Correspondence regarding status of case.
5/19/2020	Erika L. Amatore	0.50					\$ 195.00	Review order granting PPH MSJ/denying Thayer MSJ
5/19/2020	Kristen C. Rodriguez	1.10	0.80		0.30		\$ 874.50	Review and analyze order on Phase II summary judgment (.5); correspondence with client (.3); correspondence with team regarding same and next steps (fees/costs, appeal) (.3).
5/19/2020	T. Carter. White	0.80	0.80				\$ 516.00	Review and analyze summary judgment decision.
5/19/2020	Jae K. Park	1.50	1.00			0.50	\$ 1,005.00	Review court order granting summary judgment (1); conference with Lissa Singer regarding same (.5).
5/20/2020	T. Carter. White	3.00			0.40		\$ 1,935.00	Analyze next steps in case in light of summary judgment order (.4); research 8th circuit FCA fee cases (2); research sample fee motions from the 8th Circuit and S.D. Iowa (.6).
5/20/2020	Kristen C. Rodriguez	0.50					\$ 397.50	Analysis regarding fee and costs recovery.
5/20/2020	Kristen C. Rodriguez	0.30					\$ 238.50	Correspondence with client.
5/21/2020	T. Carter. White	1.30					\$ 838.50	Manage research and preparation of fee motion (.2); research out of circuit FCA fee award cases (.5); research 8th Circuit 42 USC 1988 cases (.6).
5/22/2020	T. Carter. White	4.20	0.50				\$ 2,709.00	Research out of circuit FCA fee award cases (3.2); conference with team regarding SJ decision (.5); conference with K. Rodriguez etc. regarding fee motion (.5).
5/22/2020	Kristen C. Rodriguez	0.50	0.50				\$ 397.50	Call with team regarding results of motion for summary judgment and next steps.
5/23/2020	T. Carter. White	1.50					\$ 967.50	Analyze basis of FCA fee motion based on review of research (1.3); draft email summarizing same (.2).
5/24/2020	T. Carter. White	1.60					\$ 1,032.00	Research 42 USC 1988 fee shifting cases in the 8th Circuit.
5/25/2020	T. Carter. White	1.10					\$ 709.50	Research FCA fee shifting cases.
5/26/2020	T. Carter. White	3.90					\$ 2,515.50	Research ability to recover pro bono fees and calculation of same (1.5); research sample pro bono fee motions (1); analyze strategy for fee motion (.5); emails E. Amatore regarding same (.1); conference with K. Rodriguez regarding same (.3); research petition for costs (.5).

Time Entry Records in
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Date	Name / Invoice Number	Hours	Plds, Mtn, Brief	Research	Investigation	Interviewing	Amount	Description
5/26/2020	Kristen C. Rodriguez	1.80					\$ 1,431.00	Research regarding fee and costs petitions (1.3); correspondence with local counsel regarding same (.2); Call with C. White to strategize fee petition (.3).
5/27/2020	T. Carter. White	4.50					\$ 2,902.50	Review and analyze sample fee petition and exhibits from Davis Brown (.4); begin drafting fee petition (3.4); conference with K. Rodriguez and S. Thompson regarding same (.7).
5/27/2020	Kristen C. Rodriguez	0.70					\$ 556.50	Call with S. Thompson re: fees and costs petition.

Exhibit 2

Summary of Hourly Rates for Key Dentons' Lawyers

Timekeeper	2012	2013	2014	2015	2016	2017	2018	2019	2020
A Gilbert	\$795.00	\$830.00	\$870.00	\$915.00	\$960.00	\$995.00	\$1,075.00	\$1,130.00	
C White							\$485.00	\$575.00	\$645.00
J Park							\$590.00	\$605.00	\$670.00
K Rodriguez	\$335.00	\$465.00	\$520.00	\$590.00		\$710.00	\$715.00	\$755.00	\$795.00
R Sangiacomo					\$ 420.00	\$420.00			
T Amlot	\$515.00	\$540.00	\$600.00	\$670.00	\$ 670.00	\$705.00			
T Lu					\$ 340.00	\$355.00	\$400.00	\$495.00	\$570.00

Exhibit 3

Jae K. Park

Partner



Partner

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Los Angeles
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jae.park@dentons.com

Overview

Jae Park is a litigator focusing on construction litigation and complex commercial litigation.

Mr. Park represents public and private developers, general contractors and subcontractors on a wide variety of construction disputes. He has particular experience related to public infrastructure projects and government contract procurement issues, including bid protests and the application to construction projects of the US False Claims Act and the California False Claims Act. He also represents owners and contractors in payment and performance bond claims, delay and disruption claims, prompt payment issues, bid protests, stop notice and mechanic's lien claims and claims regarding latent and patent defects in construction and design.

Mr. Park also represents businesses and individuals in commercial disputes involving commercial torts, breach of contract, real estate transactions, misappropriation of trade secrets, fraud, unfair competition and employment disputes. His clients include businesses in the construction, energy, telecommunications, chemical, defense, manufacturing and financial services industries.

In addition, Mr. Park provides pro bono legal services to victims of human rights abuses across the globe, representing refugees fleeing political and religious persecution. In recognition of his exemplary service, he received Casa Cornelia Law Center's Attorney of the Year award in 2016 and the National Asian Pacific American Bar Association's Attorney of the Year award in 2017.

Experience

- **Public agency:** Represented in a multimillion-dollar dispute arising out of a dam construction project, prosecuting the agency's claims of procurement fraud and submission of false claims.
- **General contractor:** Served as lead trial counsel in a breach of contract and violation of prompt payment claim filed by a subcontractor, arising out of a California Department of Transportation highway renovation/improvement project.
- **Accounting firm:** Served as lead trial counsel in the client's claims of breach of duty of loyalty, unfair competition and misappropriation of trade secrets, made against former employees and a competitor.
- **National bank:** Represented the bank and an employee against allegations of fraud and unfair competition.

- **General contractor:** Represented against claims of defective work in a high school campus renovation and improvement project. Achieved a favorable settlement after obtaining summary adjudication that confirmed subcontractors are obligated to fully defend and indemnify a client against the plaintiffs' claims.
- **Public agency:** Represented in a multimillion-dollar breach of contract, California False Claims Act and negligence case against several multinational construction and engineering companies, arising out of the construction of a hydroelectric power plant. Achieved a favorable settlement for the client.
- **Large HVAC/plumbing contractor:** Defended against allegations of patent infringement and unfair competition made by a competitor regarding cured-in-place-pipe rehabilitation pipe-lining technology. Achieved a favorable settlement and the dismissal by the plaintiff of all claims without compensation.
- **Large HVAC/plumbing contractor:** Successfully defended in a consolidated, multi-party toxic exposure "fear of cancer" case arising out of a project to remodel laboratory space. Negotiated a favorable settlement following expert depositions and the obtaining of issue and evidentiary sanctions against the plaintiffs.
- **National commercial bank:** Represented in a breach of contract claim by another lender on joint loan to commercial developer. Obtained a favorable settlement for the client.
- **International chemical company:** Represented in a case alleging failure to pay utility charges, and a related public corruption investigation. Obtained a favorable settlement for the client and avoided criminal charges.
- **National wireless telecommunications provider:** Successfully defended against a half-billion-dollar breach of contract and antitrust claim by a vendor. Obtained summary judgment in favor of the client on the grounds that the vendor procured contracts by fraud. The judgment was upheld on appeal.
- **National aerospace and defense contractor:** Defended against a claim of disability discrimination made by a former employee. Obtained a favorable settlement for the client.

Recognition

- Attorney of the Year, National Asian Pacific American Bar Association, 2017
- Attorney of the Year, Casa Cornelia Law Center, 2016

Insights

- "Electronic Communications and the Attorney-Client Privilege: Are Your Employees Unwittingly Waiving the Privilege by Using Company Email?," *Privacy & Data Security Law Journal*, April 2008

Activities and Affiliations

Community Involvement and Pro Bono

- Board member, Korean American Community Center of San Diego
- Board member, Total Youth Productions
- Volunteer attorney, Casa Cornelia Law Center

Presentations

- Presenter, "The Federal False Claims Act on Construction Projects," Association of General Contractors

- Presenter, "The California and Federal False Claims Act," Construction Managers Association of America, San Diego Chapter, November 6, 2014
- Presenter, "Mechanic's Lien and Stop Notice Laws," Association of General Contractors San Diego, November 13, 2013
- Co-presenter, "Mechanic's Lien and Stop Notice Law – Overview," Association of General Contractors San Diego, July 11, 2013
- Co-presenter, "Mechanic's Lien and Stop Notice Law – Comprehensive Changes in the Law Effective July 1, 2012," CAME San Diego, June 20, 2012
- Panelist, "Lateral Moves: Thinking Beyond Your First Legal Job," University of San Diego School of Law, October 8, 2008
- Speaker, "Making the Most of Your Legal Education," CLEO Program 2008, June 20, 2008
- Session leader, "Unique Challenges Facing Korean American Attorneys," KASSON 21, University of California, San Diego, March 21, 2007

Memberships

- American Bar Association
- Association of Business Trial Lawyers (Board of Governors)
- Association of General Contractors, San Diego Chapter
- Construction Managers Association of America, San Diego Chapter
- Korean American Bar Association - San Diego (co-founder and director)
- National Asian Pacific American Bar Association
- Pan Asian Lawyers of San Diego (past president)
- San Diego County Bar Association

Areas of focus

Practices

- Litigation and Dispute Resolution
- Competition and Antitrust Litigation
- Commercial Litigation
- Employment Disputes
- International Commercial Arbitration
- Trade Secrets Litigation
- Government Contracts - US
- Bid Protests
- Procurement Fraud Investigations and Defense

- State and Local Government Contracts

Industry sectors

- Defense and Space
- Construction
- Financial Institutions

Region

-

Education

- University of San Diego School of Law, 2004, JD
- University of California at Los Angeles, 1997, BA

Admissions and qualifications

- California
- US District Court for the Southern District of California

Languages

- Korean

Exhibit 4

Kristen C Rodriguez

Partner



Partner

Chicago

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M +1 312 391 8343

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Washington, DC

D +1 202 496 7188

Overview

Kristen Rodriguez is a member of Dentons' Litigation and Dispute Resolution practice. She handles a variety of complex commercial and class action litigation, at both the trial court and appellate levels. Kristen leads discovery and briefing in large-scale litigation, and has provided counsel to clients in the areas of contract, tort, advertising, privacy and insurance matters.

Kristen also serves as the chairperson of Dentons' Latino Professional Network.

Experience

- Obtained summary judgment for Lincoln Benefit Life Company in a putative US\$1 billion nationwide class action centered on alleged overcharges to universal life insurance policies, which was affirmed on appeal by the Seventh Circuit in *Norem v. Lincoln Benefit Life Ins. Co.*, 737 F.3d 1145 (7th Cir. 2013).
- Successfully defended Allstate's replacement cost coverage provisions in two putative class actions alleging violations of New York's and New Jersey's standard fire policies. *Woodhams v. Allstate Fire & Casualty Co.*, 748 F. Supp. 2d 211 (S.D.N.Y. 2010), *aff'd*, 453 F. App'x 108 (2d Cir. 2012); *Reddick v. Allstate New Jersey Ins. Co.* (S.D.N.Y. 2011).
- Member of the litigation team for Redbox Automated Retail, LLC, in a putative nationwide class action under the federal Video Privacy Protection Act, in which the Seventh Circuit affirmed the district court's grant of summary judgment in Redbox's favor. *Sterk v. Redbox Automated Retail, LLC*, 770 F.3d 618 (7th Cir. 2014).
- Achieved dismissal of a multi-count defamation action brought by a Chicago public official against the National Broadcasting Company and the Better Government Association (BGA), a government watchdog group, which was affirmed by the First District of the Illinois Appellate Court. *Kapotas v. BGA*, 2015 IL App (1st) 140534.

Recognition

Honors and Awards

- Named as one of the 2018 American Bar Association On the Rise – Top 40 Young Lawyers
- Selected to *Crain's Chicago Business* list of "Most Influential Minority Lawyers in Chicago," December 2017

Insights

Kristen is a frequent contributor to the American Bar Association's *Tort Trial* and *Insurance Law Practice Journal*.

- "Illinois Supreme Court clarifies standing under biometrics law: No actual harm needed," Dentons client alert, January 30, 2019

Activities and Affiliations

Community Involvement and Pro Bono

Kristen's pro bono work has included criminal appeals, and she has completed a Public Interest Law Initiative Fellowship in which she represented indigent defendants in felony and misdemeanor cases.

Kristen coaches a state champion high school mock trial team and she judges student mock trial competitions at all levels. As a volunteer with the Constitutional Rights Foundation's Lawyers in the Classroom program, she helps local middle school students understand the US Constitution and our legal system.

Memberships

Kristen has been selected to join the 2016 class of Leadership Council on Legal Diversity Fellows, which is an elite career development program that identifies and mentors the next generation of leaders in the legal profession.

Areas of focus

Practices

- Appellate Advocacy
- Class Action Defense
- Commercial Litigation
- Defamation and Reputation Management
- Litigation and Dispute Resolution

Industry sectors

- Insurance
- Insurance Litigation and Arbitration
- Media and Entertainment

Education

- University of Michigan Law School, 2009, JD

Admissions and qualifications

- District of Columbia
- Illinois
- US Court of Appeals for the Eighth Circuit
- US Court of Appeals for the Eleventh Circuit
- US Court of Appeals for the Second Circuit
- US Court of Appeals for the Seventh Circuit
- US District Court for the Central District of Illinois
- US District Court for the Eastern District of Michigan
- US District Court for the Northern District of Illinois

Exhibit 5

Tiffany L. Amlot

Partner

Partner

Chicago

D +1 312 876 2349

tiffany.amlot@dentons.com

Overview

Tiffany Amlot is a member of Dentons' Litigation and Dispute Resolution practice and Arbitration practice. She has broad experience litigating a wide variety of commercial disputes, including in the areas of contracts, business torts, media law, class action, financial services and insurance matters.

Tiffany has provided legal counsel to newspapers, publishers and the broadcast media. Her representation has covered a range of corporate media and First Amendment law, including defamation and privacy claims, open records and open meetings disputes, and subpoenas and media access litigation.

Tiffany has substantial experience in the defense of class actions. She has defended numerous insurers in consumer class actions challenging policy interpretation or claims practices. She has also defended health care companies in federal antitrust class actions. Tiffany represents clients in numerous product liability and toxic tort cases. She has experience in commercial finance litigation and shareholder disputes.

Tiffany has counseled clients in corporate internal investigations involving fraud and advises with regard to the management of electronic discovery issues. In addition, she is a mediator with the Seventh Circuit Electronic Discovery Mediation program.

While attending the University of Michigan, Tiffany served as a legal extern for the Ministry of Commerce in Phnom Penh, Cambodia, and completed a portion of her legal studies at the University College London.

Recognition

Honors and Awards

- Named a "Rising Star" in Litigation, *Illinois Super Lawyers*, 2010, 2012 – 2017
- Named an "Emerging Lawyer" in Commercial Litigation and Class Action/Mass Tort Defense Law, *Leading Lawyers*, 2015 – 2016

Activities and Affiliations

Community Involvement and Pro Bono

Tiffany's pro bono work has included successfully briefing and arguing the Seventh Circuit appeal of a criminal counterfeiting conviction. The Seventh Circuit vacated the counterfeiting conviction, finding that the district judge improperly limited the defendant's constitutional right to testify. *United States of America v. Canty*, 499 F.3d 729 (7th Cir. 2007).

Memberships

- President, Yale Chicago
- Past President, YaleWomen Chicago
- The Chicago Inn of Court
- Seventh Circuit Electronic Discovery Pilot Program Committee

Areas of focus

Practices

- Class Action Defense
- Commercial Litigation
- Defamation and Reputation Management
- E-Discovery
- Employment Disputes
- Litigation and Dispute Resolution
- Product Liability and Complex Torts

Industry sectors

- Communications
- Insurance Litigation and Arbitration
- Financial Institutions
- Life Sciences and Health Care
- Manufacturing
- Media, Entertainment and Sports

Education

- University of Michigan Law School, 2004, JD, associate editor and membership coordinator, *Michigan Journal of Gender & Law*, associate editor, *Michigan Journal of International Law*

- Yale University, 2000, BA (with Distinction)

Admissions and qualifications

- Illinois
- Wisconsin
- US Court of Appeals for the Eighth Circuit
- US Court of Appeals for the Seventh Circuit
- US District Court for the Eastern District of Wisconsin
- US District Court for the Northern District of Illinois
- US District Court for the Western District of Wisconsin

Exhibit 6

Rosanne Sangiacomo

Managing Associate

Managing Associate

Chicago

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Overview

Rosanne is a member of Dentons' Litigation and Dispute Resolution practice group.

Rosanne focuses on complex commercial litigation in federal and state courts. She has litigated a wide variety of claims, including breach of contract, breach of fiduciary duty, unfair business practices, fraud, successor and alter ego liability, fraudulent transfer, and insurance coverage and claims disputes. She also has represented clients in domestic and international commercial arbitrations.

Activities and Affiliations

Community Involvement and Pro Bono

- Rosanne's pro bono work includes obtaining a favorable settlement of a §1983 civil rights claim on behalf of an individual, and defending a non-profit institution in a False Claims Act matter.

Prior and Present Employment

Prior to joining Dentons, Rosanne was an associate at another full-service international law firm. While attending the University of Virginia School of Law, she served as a judicial extern at the US District Court for the Northern District of Illinois, and was a member of the *Virginia Journal of Social Policy and the Law*.

Areas of focus

Practices

- Arbitration
- Commercial Litigation
- Litigation and Dispute Resolution

- Insurance Litigation and Arbitration

Education

- University of Virginia School of Law, 2013, JD
- Northwestern University, 2010, BA, Comparative Literary Studies, *magna cum laude*

Admissions and qualifications

- Illinois

Exhibit 7

Tony K. Lu

Managing Associate



Managing Associate

Boston

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tony.lu@dentons.com

Overview

Tony K. Lu is a member of Dentons' Litigation and Dispute Resolution practice. He concentrates his practice in the areas in both prosecuting and defending trade secret cases across multiple jurisdictions. Tony also has extensive experience in complex commercial and cross-border litigation matters, as well as representing multi-national companies in the defense of products liability matters in the automotive, consumer appliance, and pharmaceutical industries. Tony has broad experience handling all aspects of litigation, from pre-suit investigations through discovery, motion practice, trial, mediations, and arbitrations in state and federal court.

Tony is a graduate of the International Association of Defense Counsel (IADC) Trial Academy held at Stanford Law School.

Experience

Trade Secret

- Counsel defending specialty manufacturer of thermoplastic elastomers (TPE) against alleged misappropriation of competitor's formula and processing techniques. *PolyOne Corp. v. Lu, et al.*, No. 14-CV-10369 (U.S.D.C., N.D. Ill.)
- Counsel to furniture manufacturer alleging trade secret misappropriation against former employee and competitor concerning designs and customer information. *Yotrio Corp. v. Coop et al.*, 18-cv-10101 (C.D. Cali.)
- Counsel for paper processing equipment manufacturer asserting trade secret misappropriation and violation of restrictive covenants against former plant manager hired by competitor. *JJ Plank Co, LLC v. Bowman*, 3:18-cv-00798 (W.D. La.)

Commercial Litigation

- Obtained stipulation of dismissal with prejudice following summary judgment filing in breach of contract and declaratory judgment on life insurance policies. *Pattison v. Prudential et al.*, 18-cv-11934 (D. Mass.)

- Obtained summary judgment in favor of commercial general liability insurer against claims of bad faith settlement practices allegedly violative of G.L. c 176D and Massachusetts Consumer Protection Act, M.G.L. c. 93A, *affirmed* on appeal. *Surabian Realty Co., Inc., et al. v. CUMIS Ins. Society, Inc.*, Appeal No. 2018-P-0766. (Appeals Ct., Worcester Cty., Massachusetts)
- Counsel to building solutions conglomerate in AAA arbitration in Massachusetts with software developer in dispute over damages following termination of software development agreement. *Clicksoftware, Inc. v. Honeywell International, Inc.*, AAA No. 01-17-0000-0163
- Obtained summary judgment as part of team in defense of health care provider accused of False Claims Act violation regarding billing practices. *Thayer v. Planned Parenthood*, 11-cv-00129 (S.D. Iowa)
- Counsel to Chinese individuals in multi-million dollar cross-border real estate property disputes in Massachusetts and China. *Fu v. Fu*, 16-2497 (Middlesex Superior Court, Massachusetts)
- Obtained dismissal on behalf of technology client in suit alleging commercial disparagement and Lanham Act violations. *Solomon v. Khoury et al.*, 16-cv-10176 (D. Mass.)

Recognition

Honors and Awards

- Selected to the Massachusetts *Super Lawyers* “Rising Star” List 2013 - 2019.

Insights

- Contributor, "Gaming in the United States: Massachusetts: Overview," *Thomson Reuters Practical Law*, August 16, 2019

Activities and Affiliations

- Board member, Asian American Lawyers Association of Massachusetts, 2011–present
- Member, Boston Bar Association

Presentations

- Moderator, “Charting a Business Plan for Your Career”, National Asian Pacific American Bar Association Northeast Regional Conference 2015.

Prior and Present Employment

Prior to joining Dentons, Tony was an associate at a mid-size law firm in Boston where he represented corporate clients in state and federal courts. Previously, he worked alongside Special Master Hon. Charles B. Swartwood III (Ret.), appointed by the US Secretary of Commerce, on a long-term investigation concerning law enforcement misconduct against the fishing industry, which resulted in two Reports and Recommendations and remittance of certain fines to the industry.

Areas of focus

Practices

- Commercial Litigation

- Intellectual Property Litigation
- Insurance Litigation and Arbitration
- Litigation and Dispute Resolution
- Pharmaceutical and Medical Device Litigation
- Product Liability and Complex Torts

Industry sectors

- Automotive
- Consumer Products
- Life Sciences and Health Care
- Manufacturing
- Pharmaceutical Companies
- Product Liability
- Aviation and Aerospace

Region

- United States

Education

- University of Connecticut School of Law, 2010, JD, *Editorial board* of the Connecticut Public Interest Law Journal
- Skidmore College, 2005, BA, *cum laude*

Admissions and qualifications

- Connecticut
- Massachusetts
- US District Court for the District of Massachusetts

Exhibit 8

Carter White

Senior Managing Associate



Senior Managing Associate

New York

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Overview

Carter White is a member of Dentons' Litigation and Dispute Resolution practice. His practice is wide-ranging, including complex commercial litigation, bankruptcy litigation and appellate advocacy, and his client base is quite varied, including insurers, telecommunications providers, power generators, casinos and banks. Carter has been involved in all aspects of litigation, from preparation of pleadings, discovery and motion practice through trial and appeal.

Experience

- **Major insurance provider:** Winning a motion to dismiss a class action complaint on constitutional standing grounds, and gaining affirmance of the decision in the Second Circuit Court of Appeals.
- **Major insurance provider:** Forcing withdrawal of a consumer class action complaint through dual service of a motion to dismiss and a Rule 11 motion.
- **Financial institution:** Defending breach of contract claims before and at trial, culminating in a favorable settlement after obtaining a ruling that plaintiffs could only recover a small fraction of their claimed damages.
- **Telecommunications company:** Engaging in motion practice that led to a favorable settlement of a commercial dispute.
- **Casino:** Representing debtor in bankruptcy case, including administering claims and litigating against various stakeholders.
- **Pro bono client:** Briefing and arguing a civil rights case before the Seventh Circuit Court of Appeals on behalf of a terminated employee.
- **Foreign debtors:** Representing various foreign debtors in Chapter 15 proceedings, including handling complex procedural issues, such as service of process under the Hague Convention.
- **Bankruptcy trustee and trade creditors:** Litigating and settling avoidance claims.
- **Pro bono clients:** Obtaining divorces for economically disadvantaged women.

- **City of New York:** Taking and defending numerous depositions in tort cases brought against the City of New York.
- **Confidential client:** Managing a response to an expedited third-party subpoena.

Recognition

In the Media

Co-author, "Exemptions of Health Care Sharing Ministries from Insurance Laws and Regulations," Dentons IREG Hot Topic, April 15, 2016

Insights

"Litigation and Debate Over Captive Reinsurance," Association of Life Insurance Counsel (ALIC), May 19, 2015

Areas of focus

Practices

- Commercial Litigation
- Litigation and Dispute Resolution
- Restructuring, Insolvency and Bankruptcy

Industry sectors

- Financial Institutions

Education

- Northwestern University School of Law, 2013, JD, *cum laude*, Articles Review Board, *Journal of Criminal Law and Criminology*
- University of Southern California, 2009, BA, *cum laude*

Admissions and qualifications

- New Jersey
- New York
- US District Court for the District of New Jersey
- US District Court for the Eastern District of New York
- US District Court for the Southern District of New York